



**STEDHAM WITH IPING  
NEIGHBOURHOOD  
DEVELOPMENT PLAN  
SUBMISSION  
FULL REPRESENTATIONS**

Respondent Reference:	RI
Organisation or Individual:	Graham Ault
Agent Details:	N/A

[REDACTED]

**From:** Graham Ault [REDACTED]  
**Sent:** 01 January 2019 12:07  
**To:** Neighbourhood  
**Subject:** Comments on Stedham with Iping Neighbourhood Plan

As a resident of Stedham I wish to make some comments on the draft Neighbourhood Plan. I have previously made these comments to the neighbourhood Plan group but they have not been acted on, nor have I received a response to them.

I broadly welcome the plan and thank the authors for their hard work in preparing it. I recognise the value of such a plan in protecting the future of the area, albeit that the status of such plans appear to have been diminished by recent government policy announcements.

One of the visions of the plan (page 5), is to "promote the use of recreational spaces....." in the parish. However, one of the largest open spaces in the area is not listed in the Local Green Spaces (page 14) and indeed the whole plan appears to be silent on the issue. That area is the green space known locally as the "Polo Fields". It is a fundamentally crucial open space adjacent to the East side of Stedham village. There are two public footpaths across the land. In addition there has been a long-term understanding that local residents can access the land for responsible recreational purposes. Indeed, this happens every day of the year and is certainly not restricted to the public footpaths.

The "polo Fields" title is mainly historical, dating back to the one time proposal to develop a polo centre here. This for many reasons did not happen. There is a theoretical polo club operating on the fields but that is, to say the least, a minimalistic activity. Indeed on the vast majority of days of the year there is no activity at all on these fields except for grass cutting and local resident access.

In recent time, there has been an indication by the owners that they seek to restrict any public activity on these fields except for the public footpaths. This is of concern to quite a few residents. It seems to me that the Neighbourhood Plan is an ideal opportunity to recognise this area as a local green space accessible in a reasonable manner by local residents.

To have it excluded from the Neighbourhood Plan (and not even referred to as a significant site) is, i suggest not part of a sustainable approach to the plan, and may well leave this stretch of largely redundant land vulnerable to attempts at unacceptable forms of development.

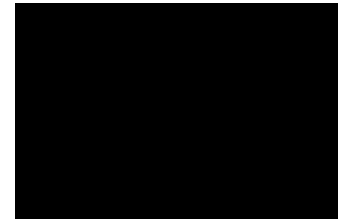
I respectfully suggest that the omission of this regularly accessed local green space is a major omission from the plan and fails to protect a highly valued local amenity.

Graham Ault  
[REDACTED]

Respondent Reference:	R2
Organisation or Individual:	Tom Ormesher, NFU
Agent Details:	N/A



National Farmers' Union



Telephone: [Redacted]

Mr Kevin Wright  
Neighbourhood Planning  
South Downs National Park Authority  
South Downs Centre  
North Street  
Midhurst  
GU29 9DH

Your ref:  
Our ref: 2019 001 TO  
Email: [Redacted]  
Direct line: [Redacted]  
Date: 3 January 2019

By email only:  
neighbourhood@southdowns.gov.uk

Dear Mr Wright

### **Submission (Reg 16) Stedham with Iping Neighbourhood Development Plan**

The National Farmers Union is a trade association representing the business interests of farmers and growers in England and Wales. This letter provides our response to matters that we feel have not been addressed since the Regulation 14 pre-submission consultation.

Our objection particularly relates to the proposed designation of Rectory Field as Local Green Space (henceforth referred to as LGS). The submission fails to demonstrate how it meets the requirements of the NPPF and associated planning practice guidance. Further there has been no meaningful attempt by the Parish Council to respond to our concerns or those raised by the owners of Rectory Field.

#### *Adequacy of Consultation and Request for Examination in Public*

Both the NFU and the owners<sup>1</sup> of Rectory Field submitted detailed responses to the Regulation 14 pre-submission consultation. However in their consultation statement the Parish Council has failed to adequately recognise those concerns, simply stating "*Feedback from the landowner and the NFU in regard to the Local Green Space designation of Rectory Field was considered. However it was felt there was sufficient grounds for keeping this in SINDP4*".

We do not feel that this adequately addresses our concerns, which is that no evidence has been provided to justify that the field is "demonstrably special" or that it complies with any part of Paragraph 77 of the NPPF (2012).

We recognise that the Parish Council held a meeting with Mr and Mrs Matthews on the 19<sup>th</sup> July 2018; however it is clear that the meeting did not consider the LGS criteria. Furthermore the Parish Council account of that meeting differs in several key aspects to the account relayed by Mr and Mrs Matthews. In particular the point recorded in the Parish Council meeting note that "*it was accepted by both parties that the draft NP identified the field as being designated as Local Green Space*". This misrepresents the views of the landowners expressed at that meeting, which is that they dispute the designation entirely.

We feel that the Parish Council has not been objective in the way it has represented submissions related to Rectory Field. For this reason we request that the Inspector calls a public meeting to hear the

<sup>1</sup> Response submitted by Genesis Town Planning on behalf of Mr and Mrs K Matthews

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evidence from all parties in order to make an objective determination concerning this LGS proposal. The matter is of such substantial long term importance to Mr and Mrs Matthews and we feel that a more objective consideration of the evidence is needed to provide a satisfactory outcome for all concerned.

#### *Designation Criteria*

As detailed in our Regulation 14 response we do not feel that the evidence clearly demonstrates the site is “demonstrably special”. This is easy to illustrate by referral to the SDNPA Guidance<sup>2</sup> which specifies that at least one of the following five key criteria must be met:

- Under **Beauty** SDNPA guidance states *“The South Downs was designated as a national park in recognition of its landscapes of exceptional beauty and importance and as such many nominated sites may be noted for their beauty. Consideration of nominated sites is undertaken in the context of this National Park’s quality landscape, and of the guidance as set out in the NPPF and PPG which state that extensive tracts of land should not be designated, LGS designation is not appropriate for most green areas, and consideration should be given as to the additional benefit of LGS designation where other designations apply”*. In our reading of this Rectory Field cannot be designated as LGS purely on the basis of a Landscape and Visual consideration, but rather would need to provide “additional benefit”.
- In terms of **Historic significance** the guidance suggests *“historic village events, historic buildings, structure or landscape features present on site with a particular connection to the local community. Evidence provided as part of site nominations, desk top research, and site visits are utilised”*. No such evidence has been provided by the Parish Council to determine that Rectory field has any particular historic significance.
- **Recreational value** – Rectory field is not formally accessible to the public. It is under private ownership and management and there are no recorded rights of way on this field. It cannot be considered special on the basis of recreational value.
- Under **Tranquillity** SDNPA guidance states *“Positive tranquillity factors include seeing a natural landscape, natural looking woodland, rivers and open vistas, and hearing natural sounds such as birdsong, an absence of human activity, or even silence. Evidence for this is gathered through observations made on site visits”*. The draft Plan provides no objective evidence concerning the relative tranquillity of this site compared to any other. Furthermore as the site is not accessible to the public it remains unclear as to how the value of tranquillity applies where it is not available as an amenity.
- **Wildlife** – until 2011 Rectory field was used for cereals production and on this basis the field is unlikely to hold substantial value as a wildlife resource. Whilst there is likely to be a basic level of interest associated with the field margins, this has not been cited in to the LGS proposal. Furthermore such wildlife interest would not be conserved by the LGS designation, nor would it be enjoyed by the public as there is no formal public access available.

In addition to the five official criteria, SDNPA offer two additional criteria:

- **Public access** *“Public access can be a key factor as to why the site may be considered demonstrably special... This criteria has been added to assist in identifying where public access is necessary in order to fulfil the criteria”*. With reference to the above, recreational value and tranquillity clearly require a right of public access that would extend beyond the life of the plan. Given that the only access to this field is by means of landowner permission, we suggest this is not a sufficiently robust level of public access on which to make the designation. It is our

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<sup>2</sup> “Local Green Spaces in the South Downs National Park: An evaluation of nominated Local Green Spaces for designation in the South Downs Local Plan” (September 2017) [www.southdowns.gov.uk/wp-content/uploads/2017/02/Local-Green-Spaces-in-the-South-Downs-National-Park-Report-and-Appendices.pdf](http://www.southdowns.gov.uk/wp-content/uploads/2017/02/Local-Green-Spaces-in-the-South-Downs-National-Park-Report-and-Appendices.pdf)

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understanding that at present, permission has been withdrawn by the landowner, so there is currently no legal public access on this land.

- **Layers of designation.** In the case of Rectory Field the Parish Council have provided no justification as to why the LGS designation would provide additional benefit over and above that already afforded by National Park status. We suggest there is no additional benefit and on that basis the LGS designation should fail.

*Reaching an agreed solution*

Throughout the consultation process Mr and Mrs Matthews have made it clear that they are willing to be flexible and reach an outcome which is favoured by all. However the ongoing maintenance and upkeep of the field is clearly a major consideration, where difficulties with machinery access make the field uneconomic to farm.

In this respect Mr and Mrs Matthews consider the field as offering potential to support several houses, which would greatly assist in helping to maintain the field in perpetuity. We believe it should be plausible to create a sensitive and appropriately scaled residential development, which would at the same time retain, preserve and enhance the qualities valued by the local community. In so doing it should be possible to sustainably preserve the local significance of Rectory Field, whilst also ensuring the site could be managed in perpetuity.

We believe that such an agreed solution would be consistent with Reg 16 Version criteria:

- SINDP OB4 Promote sustainable and affordable housing in accordance with local strategic policies; and
- SINDP OB5 Encourage new housing that meets the needs of, and is available for, the local community

We suggest that an extensive Local Greenspace Designation would not be the most sustainable outcome for this field as it would not secure the outcomes desired by the Parish Council in terms of maintenance and upkeep. By contrast enabling a sensitively designed, but limited scale residential development would in our view help to achieve the outcomes desired by all in relation to the valued visual qualities alongside the need for sustainable affordable housing, whilst also enhancing public access opportunity in this location.

Yours sincerely



**Tom Ormesher**  
Environment and Land Use Adviser  
NFU South East

Respondent Reference:	R3
Organisation or Individual:	West Sussex County Council, Sustainable Drainage
Agent Details:	N/A



[REDACTED]

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**From:** Lucy Petrie [REDACTED]  
**Sent:** 15 January 2019 13:13  
**To:** Kevin Wright  
**Subject:** Fwd: Stedham and Iping Neighbourhood Plan Reg 14 consultation

Lucy Petrie  
Chair Stedham with Iping Parish Council

Begin forwarded message:

**From:** Morag Birch <[REDACTED]>  
**Date:** 15 January 2019 at 13:09:35 GMT  
**To:** John Wheelhouse <[REDACTED]>  
**Cc:** Lucy Petrie [REDACTED]  
**Subject:** Fwd: Stedham and Iping Neighbourhood Plan Reg 14 consultation

fyi

Regards,

Morag Birch  
[REDACTED]

Begin forwarded message:

**From:** Ray Drabble [REDACTED]  
**Subject:** RE: Stedham and Iping Neighbourhood Plan Reg 14 consultation  
**Date:** 15 January 2019 at 12:43:41 GMT  
**To:** Caroline West [REDACTED], "Parish Clerk (Stedham with Iping)" [REDACTED] >  
**Cc:** Darryl Hemmings [REDACTED], Kate OKelly [REDACTED], Kevin Macknay <[REDACTED]>



Caroline,

Having reviewed the plan in the context of flood risk and drainage considerations, there are no significant risks that require comment from the LLFA.

Kind regards

**Ray Drabble**

Flood Risk Engineer (Sustainable Drainage)  
Economy, Infrastructure and Environment  
Highways and Transport  
West Sussex County Council

 CALL  IM  EMAIL

**Location:** Western Area Office, Drayton Lane, Nr. Chichester, West Sussex. PO20 2AJ.

**Contact:** [REDACTED]

(0)7590183138 | **E-mail:** [REDACTED]

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**From:** Caroline West

**Sent:** 17 May 2018 11:53

**To:** Parish Clerk (Stedham with Iping)

**Cc:** Darryl Hemmings; Kate OKelly

**Subject:** Stedham and Iping Neighbourhood Plan Reg 14 consultation

Dear Ms Crawford

Thank you for the opportunity to comment upon the Pre-Submission Neighbourhood Plan for Stedham and Iping. The focus of the County Council's engagement with the development planning process in West Sussex is the new Local Plans that the Districts and Boroughs are preparing as replacements for existing Core Strategies and pre-2004 Local Plans. Whilst welcoming the decisions of so many parishes to prepare Neighbourhood Plans, the County Council does not have sufficient resources available to respond in detail to Neighbourhood Plan consultations unless there are potentially significant impacts on its services that we are not already aware of, or conflicts are identified with its emerging or adopted policies.

In general, the County Council looks for Neighbourhood Plans to be in conformity with the District and Borough Councils' latest draft or adopted development plans. The County Council supports the District and Borough Councils in preparing the evidence base for these plans and aligns its own infrastructure plans with them. The County Council encourages Parish Councils to make use of this information which includes transport studies examining the impacts of proposed development allocations. Where available this information will be published on its website or that of the relevant Local Planning Authority.

In relation to its own statutory functions, the County Council expects all Neighbourhood Plans to take due account of its policy documents and their supporting Sustainability Appraisals, where applicable. These documents include the West Sussex Waste Local Plan, Minerals Local Plan, West Sussex Transport Plan and the West Sussex Lead Local Flood Authority Policy for the Management of Surface Water. It is also recommended that published County Council service plans, for example Planning School Places and West Sussex Rights of Way Improvement Plan, are also taken into account.

### **Strategic Transport Assessment**

The Strategic Transport Assessment of the South Downs Local Plan Preferred Options, tested the cumulative impact of development proposed within the National Park (Scenario 1: Local Plan Preferred Options) and an additional scenario which tested a higher housing number (Scenario 2: Medium Housing Target + 60%). A further assessment has also been made of the impacts of a revised distribution of development in Midhurst and Easebourne. The County Council has worked collaboratively with SDNPA to inform the Strategic Transport Assessment along with the additional assessment and on the basis of continuous review of the work carried out, supports its conclusions.

The purpose of the Strategic Transport Assessment was to undertake an assessment of the transport implications of

development proposed by the South Downs Local Plan on the highway network, identify the impacts and appropriate and feasible mitigation. Mitigation measures have then been included in the Infrastructure Delivery Plan that accompanies the South Downs Local Plan. The Strategic Transport Assessment took account of the sites allocated in the South Downs Local Plan and included a forecast estimate of background traffic growth.

In considering the Neighbourhood Plan for Stedham and Iping, the size and location of proposed site allocations have been taken into account when considering if further transport evidence is required at this stage.

The overall level of development proposed in the Stedham and Iping Neighbourhood Plan is in accordance with the forecast estimate of background traffic growth assumed in the Strategic Transport Assessment. The Strategic Transport Assessment indicates that there will be no severe impacts on the transport network that cannot be mitigated to a satisfactory level. The County Council considers that this provides sufficient evidence to justify the overall level of development proposed in the Stedham and Iping Neighbourhood Plan. Therefore, it is not necessary to produce further transport evidence before allocating the sites proposed in the Neighbourhood Plan for Stedham and Iping. The Strategic Transport Assessment indicates that over the plan period, traffic conditions in some locations are likely to worsen due to the effects of background traffic growth. If not addressed through improvements to the highway network, this could exacerbate existing congestion issues, or lead to congestion in previously uncongested locations. Therefore, as development takes place there will be a need for improvements and / or financial contributions to be secured towards the delivery of these improvements.

The County Council have no overriding concerns about the transport impacts of the Stedham and Iping Neighbourhood Plan. However, given that the pre-submission Neighbourhood Plan for Stedham and Iping includes the proposed allocation of small scale housing sites, it should be noted that site specific matters in the Neighbourhood Plan will need to be tested and refined through the Development Management process (through the provision of pre-application advice or at the planning application stage) or as part of a consultation for a Community Right to Build Order. Whilst the County Council supports the proactive approach undertaken to allocate sites in the Neighbourhood Plan, we are unable to comment on site specific matters at this stage. In considering site specific matters, please refer to the attached Development Management guidance.

The County Council currently operates a scheme of charging for highways and transport pre-application advice to enable this service to be provided to a consistent and high standard. Please find further information on our charging procedure through the following link:

[http://www.westsussex.gov.uk/leisure/getting\\_around\\_west\\_sussex/roads\\_and\\_pathways/plans\\_and\\_projects/development\\_control\\_for\\_roads/pre-application\\_charging\\_guide.aspx](http://www.westsussex.gov.uk/leisure/getting_around_west_sussex/roads_and_pathways/plans_and_projects/development_control_for_roads/pre-application_charging_guide.aspx)

**Policy SINDP7 Stedham Sawmills**

Page 17 at bullet point ix states that, "*The existing vehicular access should be suitably improved for use by occupants of all buildings.*"

*There should be no new vehicular access to School Lane;*". The Highway Authority have no in principle issues with this arrangement and welcome that access is being provided from School Lane to ensure suitable connections to the village. It does appear that the site currently benefits from an access from the A272 and clarification should be provided as to what the future use of this access to the site is.

Reference is also made on page 17 to car parking provision at bullet point x. Any future planning application should refer to the WSCC Guidance on car parking in residential developments and car parking demand calculator, which is available here, <https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/pre-application-advice-for-roads-and-transport/>.

Support is given for the recognition in the policy that development will mean increased demand for the public paths around the current sawmills. As well as (vi) of the policy, it would be appropriate to improve existing footpath surfaces and upgrade to allow cycling, which could assist suitable travel and connections to Midhurst. It is uncertain what route is referred to in SINDP7vi, as there is no public right of way (PROW) immediately north of the site, rather there is School Lane as public maintainable highway. If it is intended to refer to bridleway 916\_1, this could create a good cycle route leading from the development north of the A272 and away from the common. This bridleway, also bridleway 1132 further north that is a well-used route connecting Iping and Stedham, would benefit from improvement for local residents' health and wellbeing, connectivity and links to local businesses.

#### **Policy SINDP8 – Land west of West Lodge**

Page 18 with regards to references made to parking the comments above in relation to using the WSCC Guidance on car WSCC Guidance on car parking in residential developments and Car parking demand calculator stand.

This proposed development will increase demand for use of bridleways 916\_1 and 1132; again, it would be appropriate to improve the path surfaces for this increased demand and for users' convenience and enjoyment. Additionally a new cycleable path linking the entrance to the development from School Lane directly north along the drive to connect with bridleway 1132 would be valuable.

#### **SINDP 20 - Permissive and Public Rights of Way**

Page 34 refers to having two National Trails running through the parish. West Sussex has only one National Trail running through the county, the South Downs Way. The draft Plan is believed to refer to two locally promoted routes, the New Lipchis Way and the Serpent Trail.

The draft Plan refers to a desire for existing PROWs to be cleared and for new routes. It would be possible for the parish council to work with WSCC, maybe to set up a local volunteers group and to work to create new access rights. The parish will receive CIL monies in future and these could be allocated to improving and enhancing off-road access within the parish. Potential new routes or up-grades will require the support of landowners but a number of possibilities exist; for example:

- connecting National Trust land from footpath 1128 – a new route going west from Woolbeding bridge and crossing the River Rother could be achieved;

- various existing footpaths could be upgraded to bridleway to provide safer connections for cyclists and horse riders. Upgrading footpath 1144 north of Hammer Lane could allow riders to avoid a potentially hazardous road route. Upgrading footpaths 1134 and 1135 to bridleway would do similarly and make a better connection to users of bridleways 915 and 3343 south of the A272;
- the sightlines of bridleways 3342 and 3343 can presently be obscured by road signage, vegetation and a bus stop. Works to improve the sightlines should be easily achievable.

In the event the parish seeks to design and deliver any such schemes, it is encouraged to develop proposals with both WSCC (as local highway authority) and the SDNPA.

The parish may like to consider information provided previously to the parish council regarding the powers available to parish councils for undertaking their own works on PROW (copy attached).

### **Policy SINDP21 Car Parking**

Within the supporting text to this policy on page 35, reference is made to addressing existing parking issues within Common View and School Lane. WSCC wishes to clarify that through the planning process development can only be required to address the specific impact they are having and not existing problems un-associated with the potential impact a development may have. However, it is noted that in this instance the intention is that this work could be funded by CIL and any works to the highway would have to be in conjunction with WSCC as the Highway Authority.

In terms of the specific policy wording point 1 seeks to ensure that there will be no increase in on-road parking. Whilst there are no issues with the proposed parking requirements it is suggested that the wording is amended and the underlined text included, "*New development must provide adequate off-street (i.e. not on the public highway or any private access road) car parking spaces to meet its needs to ensure there will be no significant increase in on-road parking as a result of the development.*"

This is because it would not warrant a reason for refusal if a small level of overspill car parking occurred from the new development. It is suggested that the wording for bullet point 2 should be amended to read, "*2) No development will be permitted which significantly reduces the existing provision of on or off-road parking within the Parish.*" As above, the highway authority would not be able to support a reason for refusal if it resulted in a small loss of on-street parking.

### **Policy SINDP 22 Maintaining and Improving Accessibility**

Policy text in the fourth bullet point states that developments that reduce the accessibility for pedestrians and/or cyclists will be refused. Some context should be provided with regards this policy, that development proposals on these grounds should only be refused where the impact is severe as per the wording in paragraph 32 of the NPPF.

Kind regards  
Caroline West



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Respondent Reference:	R4
Organisation or Individual:	Southern Water
Agent Details:	N/A

**Nikki Allen**

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**From:** Policy, Planning <[REDACTED]>  
**Sent:** 22 January 2019 16:14  
**To:** Neighbourhood  
**Subject:** RE: Consultation for the Submission (Reg 16) Stedham with Iping Neighbourhood Development Plan

Dear Sir/Madam,

Thank you for your email inviting Southern Water to comment on the Submission Stedham with Iping Neighbourhood Development Plan.

We are pleased to note that our comments on the Pre-Submission version of the Plan have been addressed, and confirm we therefore have no further comments to make.

We look forward to being kept informed of the Plan's progress.

Yours sincerely,

**Charlotte Mayall**  
Development Manager



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**From:** Neighbourhood [mailto:Neighbourhood@southdowns.gov.uk]

**Sent:** 29 November 2018 15:11

**Subject:** Consultation for the Submission (Reg 16) Stedham with Iping Neighbourhood Development Plan  
**THE SOUTH DOWNS NATIONAL PARK AUTHORITY PUBLIC NOTICE OF PUBLICATION OF THE STEDHAM WITH IPING NEIGHBOURHOOD DEVELOPMENT PLAN**

### **Opportunity to Comment on the Stedham with Iping Neighbourhood Plan**

The Stedham with Iping Neighbourhood Plan has been submitted to the South Downs National Park Authority (SDNPA) for examination, by an Independent Examiner.

Please see the attached documents for further details and how to comment on the plan.

The consultation runs from **Friday 30 November 2018 to Friday 1 February 2019 (until 23:59)**.

Comments can be made by email to: [neighbourhood@southdowns.gov.uk](mailto:neighbourhood@southdowns.gov.uk) or in writing to: Neighbourhood Planning, South Downs National Park Authority, South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH.

All representations received from this consultation will be forwarded to an Independent Examiner, appointed to consider the Neighbourhood Development Plan.

The Stedham with Iping Neighbourhood Plan and supporting documents can be viewed online on the SDNPA website and the Stedham with Iping Parish Council website.

[Stedham with Iping NDP - South Downs National Park Authority](http://www.stedhamwithiping-pc.gov.uk)  
[www.stedhamwithiping-pc.gov.uk](http://www.stedhamwithiping-pc.gov.uk)

Please be advised if you make comments on the Neighbourhood Development Plan, your name and contact details will be retained by the South Downs National Park Authority, for the purposes of this consultation.

If you wish to receive further updates on this consultation or further communication in relation to the Stedham with Iping Neighbourhood Development Plan, please confirm this when you contact the South Downs National Park Authority.

Further information on your rights under the Data Protection Act 2018 / General Data Protection Regulation can be found on [www.southdowns.gov.uk/national-park-authority/transparency/privacy-statement-2/](http://www.southdowns.gov.uk/national-park-authority/transparency/privacy-statement-2/).

Yours faithfully,

Neighbourhood Planning Team

Tel No: 01730 814810

South Downs Centre, North Street, Midhurst GU29 9DH

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Website (Planning Policy): <http://www.southdowns.gov.uk/planningpolicy>

Website (Local Plan): <http://www.southdowns.gov.uk/localplan>





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Respondent Reference:	R5
Organisation or Individual:	Midhurst Area Cycling Forum
Agent Details:	N/A

[REDACTED]

**From:** [REDACTED]  
**Sent:** 22 January 2019 22:03  
**To:** Neighbourhood  
**Cc:** [REDACTED]  
**Subject:** MAC response to consultation - Stedham neighbourhood plan

Dear SDNPA,

I represent Trotton Parish Council at the Midhurst Area Cycling Forum (MAC). I have been asked by MAC to submit their response to the proposed Stedham neighbourhood plan.

Firstly it is clear that a lot of thought, time and effort has been put into the draft, and MAC would like to make comment on two points from the viewpoint of cyclists and other non motorised users (NMUs).

Page 35 - point 3 - "Encourage the creation of bridleways where footpaths exist to provide connected routes and safer road crossings for horse riders". MAC's observation is that simply making footpaths into bridleways without a suitable surface is not conducive to using their being used by cyclists or NMUs. MAC would like this wording deleted or to include the "suitable surface" phrase.

Page 35 - point 4 - "Encourage upgrade of footpaths to Midhurst for cycles to help secondary school students bicycle to Midhurst Rother College from Stedham." For similar reasons, MAC members suggest that consideration be given to: "Encourage development of safe cycling routes to help students cycle to Midhurst Rother College from Stedham and neighbouring areas."

MAC members are very grateful for the opportunity to comment on the proposed Stedham neighbourhood plan.

Kind regards,

Darren "Nobby" Stiles.

On behalf of Midhurst Area Cycling Forum (MAC).

Respondent Reference:	R6A
Organisation or Individual:	Rebecca Osborne
Agent Details:	N/A

**Nikki Allen**

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**From:** Rebecca Osborne [REDACTED]  
**Sent:** 24 January 2019 14:00  
**To:** Neighbourhood  
**Subject:** Final Consultation representation on Stedham with Iping Neighbourhood Plan

My representation follows below.

Best wishes

Rebecca Osborne

### **Representation on the Stedham with Iping Neighbourhood Development Plan (SINDP)**

My representation concerns the response by Stedham and Iping Parish Council to my pre-submission stage representation (on Page 50 of the Consultation Statement for the SINDP), regarding page 14 of the SINDP (Green Spaces) and the associated map.

I was very pleased to learn that in the proposed SINDP the allotments at Common View have been identified as being of particular importance to the local community and are to be designated as a Local Green Space, and I support this wholeheartedly. However my representation at pre-submission highlighted my concerns about the incomplete nature of this designation. The map shows only the allotments adjacent to the playing field at Common View to be included in the Local Green Space allocation, but there is more allotment land adjacent to the rear gardens of 16-21 Common View.

I was confused by the SIPC's response to my representation (to include this additional land as Local Green Space) which says "The allotments proposed are unofficial area and not considered suitable for protection".

My husband and I hold evidence in the form of a signed tenancy agreement made with Martlet Homes Ltd (now Hyde Housing) to rent an allotment at the rear 16-21 Common View, dated March 2010. We have paid rent for this allotment continuously since this time. I know that prior to this date, a neighbour (now deceased) rented the said allotment for many years. The allotment that we rent is Plot 2, and there is another small plot (Plot 1) at the location, which I understand is also currently rented from Hyde Housing.

If allotments are to be designated as a Local Green Space, the SINDP should cover all of the allotments, not just some of them.

Respondent Reference:	R6B
Organisation or Individual:	Rebecca Osborne
Agent Details:	N/A

**From:** Rebecca Osborne <[REDACTED]>  
**Sent:** 25 January 2019 17:06  
**To:** Neighbourhood  
**Subject:** Representation on the Stedham with Iping Neighbourhood Development Plan (SINDP)

This representation concerns SINDP7 - Stedham Sawmills, and the list of Qualifying Parishes on page 18.

I made a pre-submission stage representation (see page 51 of the Consultation Statement), which argued that the Qualifying Parishes should only include those directly bordering Stedham with Iping Parish, ie Woolbeding with Redford, Milland, Elsted and Treyford, Bepton, and Trotton with Chithurst.

In response, Stedham and Iping Parish Council said "comment noted and will be incorporated".

In the submission version of the SINDP, the Qualifying Parishes do list those sharing a direct border, but they also include Rogate, which does not share a border with Stedham with Iping Parish. If my comments have been incorporated as the SIPC comments implied, Rogate should not have been included in the list.

Kind regards

Rebecca Osborne



Respondent Reference:	R7
Organisation or Individual:	Jane Crawford
Agent Details:	N/A

**To: Southdowns National Park Authority**  
**Email: neighbourhood@southdowns.gov.uk**

**From: Jane Crawford**

## **Stedham Neighbourhood Plan response**

### **Page 9 About Stedham with Iping**

para 4 "provision of exercise facilities to encourage a healthy lifestyle" should be deleted.

### **Page 12 Recreational and Community Facilities**

Para 6.

Why does inappropriate and intense recreational activity only concern dogs running free, what about motorbikes on the commons?

Erosion of scheduled monuments is most likely to be caused by horses being ridden over the commons. Is the plan advocating that the commons should be closed to riders?

### **Page 15 Promoting Health and Wellbeing**

Strike out "provide facilities" and replace with "to support the Stedham Sports Association (SSA) and Stedham Memorial Hall Trust (SMT) in promoting health and wellbeing"

### **Page 16 SINDP6 Promoting Health and Wellbeing**

This policy should be removed completely.

Exercise equipment outside every new development and on local green spaces to create a fitness trail would not only be unsightly but a waste of public money for such a small community. It would be far better to put money into improving cycleways and play equipment for the children at the existing designated play areas.

The Stedham Association's sports field provides for major sports of football, bowling, cricket, stoolball and tennis. The Memorial Hall already provides for table tennis, yoga, zumba and has physical exercise classes (known at the boot camp) 3 times a week.

We are also lucky in having the commons open access land adjacent to Stedham and footpaths in every direction.

There is a gym at the Midhurst Grange Centre 1.5 miles from Stedham (8 minutes by bicycle) with suitable exercise equipment for those who wish to use it.

Page 18

### **SINDP7 (vi) Sawmills Site**

I do not understand this point. How can direct pedestrian and cycle access to the A272 and the SSSI (Stedham Common) be restricted when the vehicular access is from the A272?

There are public footpaths both on the east and west boundaries of the site leading from Stedham to the A272 opposite the entrance gate to Stedham common which are much used

by Stedham residents – the residents of any new development could not be ‘restricted’ from doing so too.

**Page 24 SINDP12 Wildlife in the wider Parish**

I am against wildflower meadows which in our parish’s public spaces would not be very large and would need constant tending,

The Prince of Wales’ wildflower meadow at Highrove is managed as a traditional hay meadow being cut in July/August and then grazed by sheep to move the seeds around. Green hay is brought in annually to introduce more species year on year. This is how to manage a successful wildflower meadow, but in last year’s drought even the Highgrove meadow was dead and unsightly.

We are very proud of our beautifully kept churchyards and public spaces which keeps up the tradition of when we won the best kept village competition in the whole of Sussex in 1990.

Respondent Reference:	R8
Organisation or Individual:	Liz Kruba
Agent Details:	N/A

## **Comments on the Stedham with Iping Neighbourhood Development Plan (2018-2033)**

I applaud and am appreciative of the efforts made by the local steering group and the SDNPA in the production of this Plan.

My comments aim to accentuate some of its content, i.e. to draw out further detail which I consider is useful to state in the Plan as it will be used as a tool to help guide future decision-making. I ask that my comments be considered and would be grateful for feedback with regard to them, should that be possible.

### 1. Our Vision for 2033, i.e. Objectives

SINDP OB1:

Include in this paragraph 'the River Rother and its tributaries'. I consider it to be a 'special quality' of the Parish which benefits in terms of recreation (including fishing), wildlife and it being a source of raw water which, following treatment at a water treatment works, is put in to public water supply.

Consider extending 'biodiversity' to 'biodiversity (habitat and species)' to provide further detail to the reader on what this encompasses.

SINDP OB13:

I consider strongly that this objective should include the provision of a public bus service. This underpins the ability to fulfil some of the other objectives, i.e.:

- SINDP OB9 – well-being of the community by ensuring that everyone in Stedham is able to readily access (regardless of age/health/finance wrt car ownership) local towns for the essential activities of shopping, healthcare, recreation and interaction.
- SINDP OB14 – a public bus service would support 'the growth of local businesses...and other forms of employment'.
- A continued public bus service would also encourage green tourism which is of benefit to the Parish in terms of traffic movements, air quality and parking.

I recognise that the importance of a public bus service is detailed in the 'Local economy and business' section (page 21).

### 2. Our Community

I welcome the inclusion of allotments in the 'Recreational and Community Facilities' and 'Local green spaces' sections and ask that they be specified in paragraph 1 of page 11 because they contribute to an 'inclusive, sociable Parish'.

Further to this, I would welcome the adoption of the allotments as an 'asset of Community Value' to protect the community spirit that is afforded by them.

### 3. The Natural Environment

I recommend the extension of this section to include the River Rother and its tributaries which are an asset in terms of the natural capital of wildlife, as well as recreation (e.g. fishing) and public water supply (see paragraph 1 above).

Also, the quality of this water environment supports the quality of the wider natural environment that is mentioned already in this section.

Furthermore, the ecology and water quality of water bodies, such as these, is required (under the Water Framework Directive) to be protected against deterioration and should be improved to achieve Good Status (where they do not).

### 4. Getting around

I consider strongly that the issue is wider than the mentioned 'off-road parking' and ask that consideration be given to including 'on-road parking' as an issue in the very first paragraph of the 'Car parking' section.

I would envisage that the development of a car parking strategy would include an assessment of both on-street and off-street parking facilities both existing and future potential.

Liz Kruba

25/01/2019

Respondent Reference:	R9
Organisation or Individual:	Sussex Wildlife Trust
Agent Details:	N/A



Contact: Jess Price

Direct Dial: [REDACTED]

E-mail: [REDACTED]

Date: 29 January 19

**By email only**

[neighbourhood@southdowns.gov.uk](mailto:neighbourhood@southdowns.gov.uk)

Stedham with Iping Neighbourhood Plan – Regulation 16 Consultation

Thank you for consulting the Sussex Wildlife Trust on the Stedham with Iping Neighbourhood Development Plan (SINDP). We are very happy to give support to plan and congratulate the steering group on their work. Neighbourhood development plans give communities a great opportunity to formalise what it is about their local environment that they cherish and how they want the area to look in the future. In particular it provides a mechanism to ensure that existing wildlife areas are protected and enhanced, and that new wildlife areas that are important in a local context are identified.

We are very pleased to see that many of the changes we recommended during the Regulation 14 consultation have been incorporated into the submission plan. We appreciate that our suggested wording regarding Iping and Stedham Commons has been added to paragraph 7 of page 12 (Recreational and Community Facilities). However, the Sussex Wildlife Trust is still concerned that the commons are listed in policy SINDP3.

Whilst we fully acknowledge and support the commons being a valuable recreation resource for the community and do not object to the commons being labelled as a 'recreational and community facility', we are concerned about how policy SINDP3 would be implemented in relation to the commons.

The commons are designated as a Site of Special Scientific Interest and Local Nature Reserve and therefore the Sussex Wildlife Trust do not think it is appropriate for the SINDP to ever support development that '*would result in the loss, or significant harm to the value*' of the commons, as stated in the second paragraph of the policy. This would also appear contrary to the ethos of the National Planning Policy Framework (NPPF) and in particular paragraphs 174a and 175b (paragraphs 117 and 118 from the 2012 version).

Additionally, whilst we are less familiar with the other recreational and community facilities listed in this policy, many are green spaces. We would expect to see their value as part of the Parish's ecological network considered in the SINDP3 in addition to their recreational and community value.

The Sussex Wildlife Trust also notes that the policy on Iping Common has been removed and replaced with a general 'Wildlife in the wider Parish' policy (SINDP12). We support the commitment to improving the value of development sites for biodiversity however we feel that the term '*promoted*' is vague and not consistent with the NPPF. We suggest that it is replaced with '*conserved, restored and enhanced*' which is more compliant with national policy and in particular NPPF paragraph 174b (paragraph 117 from the 2012 version).

Please do not hesitate to contact me about any of the above comments.

Yours sincerely

Jess Price  
Conservation Officer

Woods Mill, Henfield, West Sussex, BN5 9SD

Chief Executive: Tor Lawrence



Respondent Reference:	R10
Organisation or Individual:	Environment Agency
Agent Details:	N/A

[REDACTED]

**From:** Oxley, Marguerite [REDACTED]  
**Sent:** 29 January 2019 13:05  
**To:** Neighbourhood  
**Cc:** Hyland, Hannah  
**Subject:** Stedham with Iping NDP - Submission Version - Comments from the Environment Agency

Dear Sir/Madam

Thank you for consulting the Environment Agency on the above Neighbourhood Plan. We are a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans. We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.

### **Flood Risk**

We are pleased to see that the proposed allocations have been directed to the areas at the lowest probability of flooding and that they are all located within Flood Zone 1.

### **Allocation SINDP7 - Stedham Sawmills**

I refer to the comments that I previously made dated 15 May 2018 on the Regulation 14 consultation that the proposed development site appears to have been the subject of current and past industrial activity which poses a risk of pollution to controlled waters. Where necessary we would advise that you seek appropriate planning conditions to manage both the risks to human health and controlled waters from contamination at the site. This approach is supported by the National Planning Policy Framework.

### **Waste Water Treatment**

Again, I refer to the comments previously made on 15 May 2018. There is no mention of how wastewater will be dealt with from either of the proposed allocated sites. Foul sewage from the developments should be connected to the mains sewerage system.

Kind regards

Marguerite Oxley

Marguerite Oxley | Technical Specialist | Sustainable Places | Solent and South Downs Area |  
Environment Planning and Engagement | Environment Agency [REDACTED]

Tel external: [REDACTED]

Email [REDACTED]

our Commitment:

Sustainable Places will prioritise and drive forward environmental outcomes from our work with local authorities and partners across the Solent and South Downs Area

We have moved to GOV.UK. Our website is now available at: [www.gov.uk/environment-agency](http://www.gov.uk/environment-agency).

We offer a cost recovery service for bespoke pre-application advice. For more information go to: [gov.uk](https://www.gov.uk) or [email us](mailto:)

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Respondent Reference:	R11
Organisation or Individual:	West Sussex County Council, Planning
Agent Details:	N/A

**From:** Eloise Short [REDACTED]  
**Sent:** 30 January 2019 12:44  
**To:** Neighbourhood  
**Cc:** Kate OKelly  
**Subject:** WSCC Response - Consultation for the Submission (Reg 16) Stedham with Iping Neighbourhood Development Plan

Thank you for the opportunity to comment upon the Regulation 16 Submission Version of the Stedham with Iping Neighbourhood Development Plan. Given that the submitted Stedham with Iping Neighbourhood Development Plan (SINDP) includes the proposed allocation of small-scale housing, it should be noted that this will be subject to the resolution of any highway safety and access issues at the planning application stage or as part of a consultation on a Community Right to Build Order.

The comments below are similar to our comments at the Regulation 14 stage, which reflect the minimal changes made to the document.

#### **SINDP7 Stedham Sawmills**

Following Regulation 14 comments, the County Council continues to request clarification in the policy be provided as to the access to the site.

There should be reference to the County Council's guidance to parking in residential developments or to parking guidance within the relevant Local Plan for the area.

It is uncertain what route is referred to in SINDP7viii, as there is no public right of way (PROW) immediately north of the site, rather there is School Lane as public maintainable highway. It is suggested that the policy refers to amenity of the public rights of way in the vicinity of the site to save confusion.

#### **SINDP8 Unallocated Residential Development**

Suitable and safe access and car parking is not referred to within the revised policy.

As stated above, there should be reference to the County Council's guidance to parking in residential developments or to parking guidance within the relevant Local Plan for the area.

#### **SINDP19 Permissive and Public Rights of Way**

In the supporting text on page 35, the introductory paragraph has not been revised following changes to policies 19 and 20 – the policy numbers need to be transposed.

Also the text restates there being two National Trails running through the parish; as advised at Regulation 14, the Trails referred to are not National Trails but two locally promoted routes, the New Lipchis Way and the Serpent Trail.

The wording at the end of the first paragraph under Permissive and Public Rights of Way is suggested to be changed to the following: *"Maintenance of PROWs is the responsibility of the WSCC but the Parish Council can ~~apply pressure~~ work with the County Council to suggest/prioritise the order of work"*

#### **SINDP20 Car Parking**

Within the supporting text to this policy on page 35, reference is made to addressing existing parking issues within Common View and School Lane. WSCC wishes to clarify that through the planning process development can only be

required to address the mitigation requirements of the development and not to resolve existing problems un-associated with the proposed development. Any works to the highway would have to be in conjunction with WSCC as the Highway Authority.

As previously stated at Regulation 14, it is suggested that the wording for bullet point 2 should be amended to read, "2) No development will be permitted which *significantly* reduces the existing provision of on or off-road parking within the Parish.". The highway authority would not be able to support a reason for refusal if it resulted in a small loss of on-street parking.

## **SINDP 21 Maintaining and Improving Accessibility**

Policy text in the fourth bullet point states that developments that reduce the accessibility for pedestrians and/or cyclists will be refused. Some context should be provided with regards this policy; development proposals on these grounds should only be refused there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe, as per the wording in paragraph 109 of the NPPF.

## **Community Infrastructure Levy**

It should be noted that no mechanism currently exists for prioritising infrastructure needs across different public services and allocating funds to priority projects. The County Council is working with South Downs National Park Authority and other Local Planning Authorities to develop a robust mechanism and establish appropriate governance arrangements to oversee the prioritisation of infrastructure across different services. This will be important to secure delivery of priority projects and the County Council would welcome the Council's support for establishing appropriate decision-making arrangements.

Kind regards,

**Eloise Short**

Phone: [REDACTED]  
[REDACTED]

---

**From:** Neighbourhood [mailto:Neighbourhood@southdowns.gov.uk]

**Sent:** 29 November 2018 15:11

**Subject:** Consultation for the Submission (Reg 16) Stedham with Iping Neighbourhood Development Plan

## **THE SOUTH DOWNS NATIONAL PARK AUTHORITY PUBLIC NOTICE OF PUBLICATION OF THE STEDHAM WITH IPING NEIGHBOURHOOD DEVELOPMENT PLAN**

### **Opportunity to Comment on the Stedham with Iping Neighbourhood Plan**

The Stedham with Iping Neighbourhood Plan has been submitted to the South Downs National Park Authority (SDNPA) for examination, by an Independent Examiner.

Please see the attached documents for further details and how to comment on the plan.

The consultation runs from **Friday 30 November 2018 to Friday 1 February 2019 (until 23:59)**.

Comments can be made by email to: [neighbourhood@southdowns.gov.uk](mailto:neighbourhood@southdowns.gov.uk) or in writing to: Neighbourhood Planning, South Downs National Park Authority, South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH.

All representations received from this consultation will be forwarded to an Independent Examiner, appointed to consider the Neighbourhood Development Plan.

The Stedham with Iping Neighbourhood Plan and supporting documents can be viewed online on the SDNPA website and the Stedham with Iping Parish Council website.

[Stedham with Iping NDP - South Downs National Park Authority  
www.stedhamwithiping-pc.gov.uk](http://www.stedhamwithiping-pc.gov.uk)

Please be advised if you make comments on the Neighbourhood Development Plan, your name and contact details will be retained by the South Downs National Park Authority, for the purposes of this consultation.

If you wish to receive further updates on this consultation or further communication in relation to the Stedham with Iping Neighbourhood Development Plan, please confirm this when you contact the South Downs National Park Authority.

Further information on your rights under the Data Protection Act 2018 / General Data Protection Regulation can be found on [www.southdowns.gov.uk/national-park-authority/transparency/privacy-statement-2/](http://www.southdowns.gov.uk/national-park-authority/transparency/privacy-statement-2/).

Yours faithfully,

Neighbourhood Planning Team

Tel No: 01730 814810

South Downs Centre, North Street, Midhurst GU29 9DH

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Email: [neighbourhood@southdowns.gov.uk](mailto:neighbourhood@southdowns.gov.uk)

Website (Neighbourhood Plans): <https://www.southdowns.gov.uk/planning/community-planning>

Website (Planning Policy): <http://www.southdowns.gov.uk/planningpolicy>

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Respondent Reference:	RI2
Organisation or Individual:	Stedham Sawmills Owners
Agent Details:	Andrew Elliott, Terence O'Rourke





TERENCE  
O'ROURKE

Neighbourhood Planning  
South Downs National Park Authority  
South Downs Centre  
North Street  
Midhurst  
GU29 9DH

[neighbourhood@southdowns.gov.uk](mailto:neighbourhood@southdowns.gov.uk)

30 January 2019

Our Reference: 192601K

Dear Sir/Madam

**Consultation on the Stedham with Iping  
Neighbourhood Development Plan (SINDP)**

**Response of the Stedham Sawmill Landowners**

This response is submitted on behalf of the landowners of the Stedham Sawmills site, Ms J Manson, Mr W Knight and Mr G Watson ("the Landowners").

Following their original objections, the Landowners have recently submitted statements and attended hearings of the South Downs Local Plan Examination, with a particular focus on Local Plan Policy SD92 relating to the Stedham Sawmills site. At the current time the Examination outcome in relation to Policy SD92 is not yet known, indeed a range of Main Modifications to Policy SD92 have yet to be consulted upon.

Given that it appears to be accepted by Stedham with Iping Parish Council that the neighbourhood plan should conform to the strategic policy position set out by Local Plan Policy SD92, it is considered by the Landowners that the current neighbourhood plan consultation is premature in relation to Stedham Sawmills matters given that the outcome of the Local Plan Examination is pending. Notwithstanding this we offer here our representations on the SINDP content.

We also attach a copy of a statement to the Local Plan Examination hearing on Policy SD92, dated November 2018, which provides further explanation of the Landowners' concerns.

Yours faithfully



Andrew Elliott  
Technical Director

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#### *SINDP1 Settlement boundary*

1. For reasons of conformity with strategic policy, the final position of the SINDP settlement policy boundary insofar as it relates to Stedham Sawmill site should reflect the boundary of development as will be determined by the eventual outcome of the South Downs National Park Local Plan Examination.
2. The Landowners have raised objection to the content of Policy SD92 and its boundaries through the South Downs Local Plan Examination hearings.
3. The Landowners consider the former Sawmill Site to be a suitable location for comprehensive housing development with integrated green infrastructure. For Local Plan soundness reasons they propose that the whole of the site be included in a site allocation and included within Stedham's settlement policy boundary, with the number of residential units and configuration of green infrastructure being ultimately determined through the preparation of planning application stage proposals.

#### *SINDP2 Preserving our rural character*

4. The SINDP requirement for the built form of new development to not be visible from the A272 is likely to be unrealistic in the context of the Stedham Sawmill site, particularly in the winter months with an absence of leaves on trees. A well considered landscape strategy is required that minimises visual intrusion and maintains rural character, but given the existing glimpsed visibility of this site from the A272 it is considered that the precise policy requirement is unrealistic and not fully deliverable.
5. National policy advises that neighbourhood plans need to be deliverable. The policy should be re-worded to seek to minimise as far as practicable the visual intrusion of new development in views from the A272.

#### *SINDP7 Stedham Sawmills site*

6. The Landowners have recently attended hearings of the South Downs Local Plan Examination, with a particular focus on Local Plan Policy SD92 relating to the Stedham Sawmills site.
7. At the hearings the Landowners stated concern that an unnecessarily complex, inflexible and poorly conceived mixed-use policy for the Stedham Sawmills site will affect development viability and deliverability, contrary to national planning policy.
8. At the time of writing the Examination outcome in relation to Policy SD92 is not yet known, indeed a range of Main Modifications to Policy SD92



have yet to be consulted upon. At present it is not known whether all or some of the suggested Policy SD92 changes put forward by the Landowners will be taken forward in an updated site policy.

9. Given that it appears to be accepted by Stedham with Iping Parish Council that the neighbourhood plan should conform to the strategic policy position set out by Local Plan site allocation Policy SD92, it is considered by the Landowners that the current SINDP consultation is premature in relation to Stedham Sawmills matters. Indeed, the Landowners consider that an additional layer of site policy through SINDP7 is not necessary given the role and purpose of Local Plan site allocation Policy SD92 and other strategic policies of the Local Plan.
10. Through the South Downs Local Plan Examination the Landowners stated concern that an unnecessarily complex, inflexible and poorly conceived mixed-use policy for the Stedham Sawmills site will affect development viability and deliverability, contrary to national planning policy. Similarly, the Landowners consider that SINDP policy for the site fails to meet basic conditions in that it is contrary to the National Planning Policy Framework (NPPF) by adding further policy burdens, providing uncertainty and unnecessarily constraining the delivery of a strategic site allocated for development in a local plan. The concerns include:
  - The requirement that a proportion of the market housing shall “meet the needs of the elderly” lacks clarity on what is sought and is unnecessary in the context of Local Plan Policy SD92 which requires a balanced mix of housing on sites and, where evidenced, a variation of the policy mix to meet local needs.
  - The requirement that affordable housing “be led” by a Community Land Trust and “involve agreement with the local housing enabler” is unclear in its meaning and there is concern that it could be onerous in practice and adversely affect the deliverability of a housing development. The policy is not underpinned by an evidence base to justify its content. Moreover, a CLT does not have a landowning interest in the site.
  - Land use plans can decide what type, mix, and – broadly – what design of development goes on a site – the built outcome. However, it should not be the role of plans to dictate in a very narrow and prescriptive way how that development will be delivered (the process to produce that outcome). Whilst a policy may suggest delivery options the process should be a decision for the developer of any site. The policy might preclude a developer delivering a site that has an established link with a registered provider / housing association.
  - In 2006 Government guidance applicable at that time stated that affordable housing providers should not be prescribed by local authorities in planning conditions and obligations (Delivering affordable housing, November 2006). Now cancelled Circular 6/98 also stated that local planning authorities should not prescribe which partners



developers should use to deliver the affordable housing of a development.

- The affordable housing policy content of the SINDP is unnecessary and confusing given South Downs Local Plan policy SD28 which provides relevant guidance. This states that occupancy conditions and local connection criteria will be applied to affordable housing to ensure local needs are met. Selection will be managed through a partnership approach with the housing authority and established community-led and legally constituted organisations or CLTs where applicable. Supporting text to SD28 clarifies that cascade mechanisms will apply with the needs of the host community or communities; then the parish; and then the wider area including nearby parishes in the National Park, as necessary. By contrast the specific local connection criteria and policy prescription of SINDP7 are inflexible and are not appropriately evidenced. In the absence of a cascade mechanism there is the potential for there to be unallocated houses which would impact viability/deliverability.
- Matters associated with employment provision on the site, layout, on site habitat creation and access / connections to movement routes are within the scope of Local Plan policy SD92 and are therefore not needed in the SINDP. Whilst the Landowners have made objections to SD92 as currently drafted it is envisaged that a finalised version of Policy SD92 will provide adequate guidance for planning applications. The criteria in SINDP7 add complexity and are not necessary. The attached copy of the Landowners' Local Plan Examination hearing statement on Policy SD92, dated November 2018, further explains the Landowners' points on these matters.
- The daylighting / sunlight requirement of SINDP7 is unnecessary in view of the policy criteria that apply through South Downs Local Plan Strategic Policy 5 on Design and paragraph 123d of the NPPF.
- The proposed requirement for one visitor parking space per dwelling in a shared off-road car park is onerous and will result in an unnecessarily large area of hard surfacing being created on the site for parking purposes. If needed, it is considered that any policy wording in this respect should simply clarify that visitor parking provision should be wholly accommodated on site, with the form and type of provision having regard to the mix and type of residential units proposed and layouts that avoid the potential for ad hoc parking in inappropriate places. However, the Landowners consider that the policy is not required in view of the content of South Downs Local Plan Policy SD22. See also our further comments on SINDP20.

#### *SINDP9 Key employment sites*

11. The Landowners have recently attended hearings of the South Downs Local Plan Examination, with a particular focus on Local Plan Policy SD92 relating to the Stedham Sawmills site.



12. At the hearings the Landowners stated concern that an unnecessarily complex, inflexible and poorly conceived mixed-use policy for the Stedham Sawmills site will affect development viability and deliverability, contrary to national planning policy.
13. At the time of writing the Examination outcome in relation to Policy SD92 is not yet known, indeed a range of Main Modifications to Policy SD92 have yet to be consulted upon. At present it is not known whether all or some of the suggested Policy SD92 changes put forward by the Landowners will be taken forward in an updated site policy.
14. Given that it appears to be accepted by Stedham with Iping Parish Council that the neighbourhood plan should conform to the strategic policy position set out by Local Plan site allocation Policy SD92, the content of SINDP9 may need to be updated, particularly if the finalised Local Plan policy amends or removes the employment element of the Stedham Sawmills site allocation.
15. Evidence underpinning the Local Plan (The SDNPA Employment Land Review update, 2017) finds that Stedham Sawmill site is “*not fit for purpose*” in terms of employment use, and concludes there is need to “*consider alternative uses...such as housing*” as it is a “*very poor quality under occupied site*”. (NB - The current levels of existing employment on the site are low and it is transitory in nature. At best there are currently five full time equivalent employees at the site. The principal business on the site is a joinery. The business owners are at or approaching retirement age. They haven’t found anyone to take on the business in the future and anticipate that it will close).
16. The Landowners’ statements to the Local Plan Examination hearings on employment matters and on Policy SD92 express concern that the employment element of the policy is not deliverable. In view of the continuing lack of market interest for employment the use of the site, as experienced over a considerable period of time, policy should now be focusing on a deliverable development that optimises the potential of the site for residential purposes. The Landowners will be elaborating on these points and providing further evidence if necessary to the forthcoming consultation process for the Main Modifications to the Local Plan.
17. We have attached to this response a copy of the Landowners’ Local Plan Examination hearing statement on Policy SD92, dated November 2018, which further explains the Landowners’ concerns in relation to employment delivery matters.

#### *SINDP20 Car parking*

18. We re-iterate concerns as expressed on SINDP7 that the proposed requirement for one visitor parking space per dwelling is onerous and is not evidenced. This overall policy is not required in view of the content of

South Downs Local Plan Policy SD22. Appropriate visitor parking levels will need to take into account the precise number and mix of new homes, and the likely nature and type of occupation, and should not be arbitrarily pre-determined.



## **Appendix**

Landowners' statement to the South Downs Local Plan Examination hearing on Local Plan Policy SD92, dated November 2018

**Position Statement on behalf of Ms J Manson, Mr W Knight and  
Mr G Watson, the Landowners of the 'Stedham Sawmill' site**

**MATTER 10: Issues Relating to Specific Settlements  
Stedham**

**MATTER 11: Issues Relating to Individual Sites  
Allocation Policy SD92**

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**1. Background**

- 1.1 This statement relates to the Stedham Sawmill site and Policy SD92.
- 1.2 It is noted that Policy SD92 has been subject to numerous proposed changes by SDNPA since the production of the submission version plan, which have yet to be formally consulted upon.
- 1.3 A SoCG has been prepared with SDNPA and added to the library as Core Document reference SoCG17. It contains a variety of background information, including:
- A description of the site
  - A summary of the current, limited employment use of the site
  - Relevant planning history for the site, and
  - Issues agreed and issues in dispute.
- 1.4 The SoCG confirms agreement that:
- The site is sustainably located and suitable for development purposes (para 3.1)
  - Effective use should be made of previously developed land (PDL) at the site (para 4.1)
  - Landscape considerations do not preclude a well-considered development in this location (para 6.1)
  - Residential use of the site has the potential to provide benefits to the local community including improving pupil numbers to support the adjacent primary school's viability, providing affordable housing for local people, and improving access to adjoining common land (para 8.1)
- 1.5 The SoCG highlights key evidence informing the plan process as follows:
- SDNPA's SHLAA concludes that the site "*has potential*" for a yield of 30 residential units (para 10.1)



- SDNPA's Employment Land Review (ELR) finds that the site is a "very poor quality" under occupied employment site that is not "fit for purpose" and there is a need to "consider alternative uses...such a housing" (para 10.2).

## **2. The Position of the Landowners**

**2.1 Despite agreement on the principles as identified above, the Landowners consider that the emerging policy for the site is ill-conceived and ad-hoc. The policy wording fails soundness principles in that it ignores the findings of SDNPA's own supporting evidence. The policy approach fails to make efficient and appropriate use of the suitable and available land at Stedham Sawmill. It is inflexible and threatens the deliverability of development.**

**2.2 More specifically, the policy requires amendment because:**

- A. There is no reasonable prospect of the site being used for employment purposes as proposed by the emerging plan. The site is not suitable or attractive as an employment location, as evidenced by SDNPA's own ELR evidence and by the Landowner's past and recent site marketing. Active employment use of the site at present is minimal.**
- B. The settlement policy boundary, development quantum and the form and extent of biodiversity enhancement area put forward for the site are arbitrary.**
- C. Greater policy weight should be placed on the development opportunity offered by the site, in principle, in view of the presence and extent of PDL, the scale of development that has been approved, and the landscape capacity of the site.**

**2.3 The Landowners consider the former Sawmill Site to be a suitable location for comprehensive development for housing with integrated green infrastructure. They propose that the whole of the site be included in Stedham's settlement policy boundary, with the number of residential units and configuration of green infrastructure being ultimately determined through the preparation of planning application stage proposals including deliverable SSSI impact mitigation measures.**

**2.4 There is concern that an unnecessarily complex, inflexible and poorly conceived mixed-use policy for the site will affect the site's viability and deliverability, and compromise the development quality required in the national park.**

### **A. No reasonable prospect of the site being used for employment**

**2.5 The Examination is proceeding by reference to the 2012 version of the NPPF. Paragraph 22 of the NPPF seeks to avoid the protection of allocated employment land where there is no reasonable prospect of a site being used for that purpose.**

- 2.6 SDNPA's own evidence finds that the site is "*not fit for purpose*", and concludes there is need to "*consider alternative uses*" for Stedham Sawmill "*such as housing*" as it is a "*very poor quality under occupied site*". SDNPA ELR update, 2017 (TSF30 site ref C8. Printed page references, 7, 10 – para 2.21 and Table 2.4, 11, 20 and 40).
- 2.7 The site has been allocated and available for employment purposes for many years, but despite successive outline planning permissions being granted and ongoing marketing activity there has been very limited interest in it.
- 2.8 National agent Lambert Smith Hampton (LSH), which has had a long-term regional presence in the south, has been working for the landowners of the western part of the site, Ms Jill Manson and Mr William Knight, on a continuing basis for over 11 years.
- 2.9 LSH was formally instructed to market the site in 2007. At that time the site had (again) been granted outline permission for B1 use, which was renewed in 2010 and 2013. There was "*a limited level of real enquiry at that time and no substantive requirements were subsequently expressed nor pursued*".
- 2.10 In August 2018 an up to date marketing report was prepared by LSH for the landowners of the western part of the site. (This report has been shared with SDNPA. We are not able to append the report to our statement).
- 2.11 The marketing report confirms that:
- LSH was formally re-engaged in July 2016 to recommence marketing the site to prospective buyers, with the remit that this could be targeted to a range of employment related occupiers or developers. The submission and approval of outline planning application SDNP/16/03850/OUT in 2016/17 provided a firm basis against which to again test market interest in the site.
  - Whilst LSH has spoken to many parties about the land in the last two years, it reports that "*there has been no meaningful interest or subsequent positive engagement*". As at August 2018 no offers had been received (solicited or unsolicited).
- 2.12 The August 2018 marketing report by LSH provides a view that 'live-work' accommodation "*would have little appeal to purchasers and end users in this location*" and "*demand, particularly from local people, would be insufficient to attract developer or investor interest*". "*The potential conflict in use and higher build cost are other unfavourable issues*".
- 2.13 The report also identifies that:
- "To the best of our knowledge, there has been no meaningful speculative development in the Midhurst area since 2010 and it is worth noting that in an appreciably better location, and in a marketplace with stronger demand, such as Petersfield (alongside the A3), new development activity has not materialised and potential sites such as the consented 5,500 sqm employment space at Buckmore Business Park since 2013, remains largely undeveloped"*.

- 2.14 Policy SD35 and Appendix 3 of the Submission Plan set out marketing requirements for change of use applications. It is considered that a robust marketing campaign for Stedham Sawmill of well over the minimum 12 months period has been undertaken to clearly demonstrate that there is no market demand for the employment site development.
- 2.15 In conclusion the landowners consider that there is no realistic prospect of an employment element of a mixed-use development at the Stedham Sawmills site being delivered as proposed by the emerging plan.
- 2.16 In view of the continuing lack of market interest for employment the use of the site, as experienced over a considerable period of time, policy should now be focusing on a deliverable development that optimises the potential of the site for residential purposes.

### **B. Arbitrary policy parameters**

- 2.17 The SDNPA SHLAA, 2016 (TSF10), concludes that the Stedham Sawmill site “*has potential*” for a yield of 30 residential units, for delivery in a 6-10 year period (Site CH123, Appendix D).
- 2.18 The September 2017 Pre Submission Draft plan allocates the site for mixed-use development of 16-20 homes and up to 3,000m<sup>2</sup> of B1 business use floorspace.
- 2.19 The Schedule of Changes to the Pre-Submission Local Plan, April 2018 (SDLP 01.1) amends Policy SD92 for the Stedham Sawmill site, proposing mixed-use development of up to 16 homes and approximately 1,500m<sup>2</sup> of employment uses B1b R&D and B1c light industrial.
- 2.20 The above shows that emerging policy content has been varying considerably, without any obvious rationale for many of the changes. Notably the approach on employment is confusing, and has not involved any input from the Landowners. As identified earlier, the employment use policy proposal is not supported by evidence of a deliverable development proposition.
- 2.21 No layout or design capacity work has been presented by SDNPA to support the proposed development quantum. Similarly, the position of the settlement policy boundary and quantum of land for “*biodiversity enhancement – to remain undeveloped*” is arbitrary (this latter point will be explained in a later section on biodiversity). In view of this, it is considered that greater policy flexibility is essential, with an objective to make best use of the site for residential development purposes.

### **C. Greater policy weight should be placed on the development opportunity offered by the site, in principle**

- 2.22 The NPPF 2012 encourages the effective use of PDL (brownfield land).
- 2.23 By reference to the 1977 Established Use Certificate, the physical layout of the site (with one principal access, one surrounding boundary fence and no internal physical

division), and the history of use and ownership, it is the view of the Landowners that the whole of the fenced site is PDL, albeit that not all of it has been built upon. SDNPA considers that only the eastern half of the site is brownfield, but the distinction between PDL is of limited relevance in this instance (SoCG17, para 4.5).

- 2.24 Notwithstanding disagreement on the PDL status, successive outline planning permissions have been approved by planning authorities for the vacant western part of the site. The most recent of these, dated 30 March 2017 (reference SDNP/16/03850/OUT), which was approved by SDNPA, permits up to 2,746m<sup>2</sup> of B1 light industrial employment uses and associated car parking and access (see illustrative layout in SoCG17 Appendix C). This permission provides a certain planning position against which recent marketing of the site has been undertaken. It confirms that a fairly intensive form of development is acceptable at this location.
- 2.25 Landscape is not a major constraint to the development capacity of the site. The site is well enclosed visually. The site can be developed without loss of trees, which are largely situated outside of the site boundary.
- 2.26 A landscape character and visual appraisal for the whole site was completed on behalf of the Landowners in August 2018, in support of residential development. (This report has been shared with SDNPA. We are not able to append the report to our statement).
- 2.27 The appraisal concludes that:
- Vegetation around the site creates a strong sense of enclosure
  - Development could be achieved without any loss of the surrounding tree belts and other screening woodland vegetation
  - The site is well positioned to the settlement edge but is sufficiently distant to avoid any significant effects on the character and appearance of the village, its conservation area or any listed building
  - Dense and tall boundary vegetation prevents any significant views into or out of the site limiting the zone of visual of influence and the effects on adjacent visual receptors to a very small area
  - Overall, the site is of "*low landscape sensitivity*" and has a "*high capacity*" to accommodate residential development proposals of the Landowners "*without affecting the character of the surrounding enclosed landscape*".
- 2.28 The site is within flood zone 1 (low probability). Amended Policy SD49 1a) now directs "*development to Flood Zone 1, wherever possible*" (SDLP 01.1, p22).

### 3. Other matters

#### **On-site biodiversity enhancement and off-site impact on Iping and Stedham Common SSSI**

- 3.1 Representations from Natural England (NE) in November 2017 expressed concern with the pre-submission Policy SD92 housing allocation due to the close proximity of the SSSI (Comment ID:2351).
- 3.2 The policy has subsequently been proposed for modification by SDNPA at the request of NE, although these changes have not yet been consulted upon.
- 3.3 The policy objection was a surprise to the Landowners, and represents a change from the past advice of NE.
- 3.4 In 2013 the Landowners approached NE through its advice service in respect of the potential development of the site for approximately 35 dwellings. In its written response dated 6 September 2013, NE stated:
- "The site is in close proximity to Iping Common SSSI. Whilst there is no real evidence that recreational pressure is having an existing impact on the ground nesting birds on the common at present, this possibility cannot be ruled out.*
- As discussed at our meeting, possible ways to mitigate for potential impacts from the dwellings proposed would be to provide a financial contribution to Sussex Wildlife Trust to aid in managing the designated site...*
- ...I can confirm that Natural England are unlikely to object to a proposal for this scale of development in this location on the basis of impacts on the SSSI if a suitable mitigation in the form of a financial contribution is identified."*
- 3.5 In view of NE's recent representations to the local plan process it is recognised that a more cautious approach is now being taken for the site. In recent weeks the Landowners have been exploring mitigation options and opportunities with NE and the Sussex Wildlife Trust (SWT), and this work is ongoing. The Landowners will be able to report back fully on this as part of any future policy consultation.
- 3.6 Through the SoCG the Landowners have put forward the potential of open access common land to the immediate west of the site, that is not designated SSSI, to provide pedestrian access/dog walking routes linked to the site. SDNPA has noted this potential and has proposed a specific policy modification that "a direct pedestrian access" be provided "to common land to the immediate west of the site (north of the A272)".
- 3.7 Conservation and ecologist officers of SWT met with representatives for the Landowners on 15 November 2018. The site and surrounds were walked together. Recreational impacts on the SSSI, mitigation and Policy SD92's on-site biodiversity enhancement options were discussed at a high-level. It was agreed in writing with SWT following the meeting that:

- *“At the present time evidence is not available to determine whether visitor numbers or behaviours are adversely impacting on ground-nesting birds [on the SSSI], however pressure on the Commons is similar to those experienced on many heathland sites in Southern England”.*
- *“SWT would potentially be open to discussions relating to the funding of management operations on the SSSI should additional mitigation measures be required for the Stedham Sawmills site. The nature of the mitigation package would need to be agreed once full details of any scheme were available”.*
- The non-SSSI common land west of the site is in third party ownership, but *“the network of paths (both public rights of way and informal) already provide a series of circular walks and could serve to deflect some recreational pressure away from the SSSI”.* *“The links through this land to existing facilities in the village such as the pub, garden centre café and school increase the likelihood of new residents using this area”.*
- The SD92 policy proposal for biodiversity enhancement land within the site close to the A272 *“may encourage access to the SSSI, and therefore be counter-productive in terms of mitigation”.* *“By placing open space in the northern part of the site it is better related to the existing facilities in the village and would naturally lead into the adjacent [non SSSI] common land”.* *“Removing the perimeter fencing would improve permeability”.* *“The presence of a south-facing bank with sandy exposures in the northern part of the site could be developed as an area of acid grassland to deliver biodiversity gain on site”.* *“Some heathland species may also be present in the seedbank”.*
- It is thought that *“due to the increased clay component in the soil across the rest of the allocation site and its lower lying nature”* that attempting to create heathland habitat would *“possibly be more challenging and costly than the creation of acid grassland or acid-leaning meadow”.*
- *“Careful consideration of the detailed design and layout of the development and green infrastructure elements is required, and is best reviewed together in detail at application stage rather than being predetermined by arbitrary policy parameters”.* SWT prefers planning policy *“to address general principles rather than being overly prescriptive”.*

3.8 The Landowners' conclusion on the above is that firm mitigation measures and the quantum and location of land on-site for green infrastructure/biodiversity enhancement is best determined at planning application stage. Planning policy should address general principles of mitigation and biodiversity enhancement rather than being prescriptive.

## 4. Conclusion

4.1 The Landowners call for a more flexible policy approach to support the early delivery of a comprehensive and integrated development for the site as a whole. There is a need to make efficient and appropriate use of the suitable and available land. The role of the site in contributing to meeting housing needs should be the priority, particularly in view of the local and affordable housing needs of Stedham and the surrounding parishes and limited other opportunities to meet them.

4.2 Policy SD92 requires amendment based on the following principles:

- The policy should not contain an element of employment provision, as this does not have reasonable prospect of being deliverable as part of a comprehensive scheme and would fetter the delivery of housing. Additional homes in the national park is the greater priority.
- Precise residential development unit numbers should be determined at planning application stage, removing any artificial limit.
- The form, quantum and location on-site green infrastructure/biodiversity enhancement can be determined at planning application stage based upon a more detailed review of the potential and benefits. There is a risk that the scale and location of provision in the south of the site, as presently proposed by SDNPA, could draw dog walkers towards the SSSI and be counter-productive in terms of mitigation. An alternative approach is required through detailed design to direct movement on foot towards more suitable existing routes to the west of the site on common land that is not designated SSSI.
- In view of the above, the settlement policy boundary should include the whole of the site.

Word count: 2,998 words

Respondent Reference:	R13
Organisation or Individual:	Historic England
Agent Details:	N/A





Historic England

Neighbourhood Planning  
South Downs National Park Authority  
South Downs Centre  
North Street  
Midhurst  
West Sussex, GU29 9DH

Our ref: HD/P3331/

Your ref:

Telephone

Fax

30<sup>th</sup> January 2019

Dear Sir or Madam,

### **Stedham and Iping Neighbourhood Plan Submission**

Thank you for your e-mail of 29<sup>th</sup> November advising Historic England of the consultation on the Stedham and Iping Neighbourhood Plan. We are pleased to make the following comments in line with our remit as the Government's advisers on the historic environment.

We welcome the reference to "wonderful heritage assets" in the Foreword and are pleased that the Steering Group has sought ways to protect these.

We understand the principle in the final paragraph on page 5 "*For a planning application to be considered favourably, all relevant policies contained within this plan should be considered and complied with*". However, this could be considered to go beyond Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990, and paragraph 2 of the National Planning Policy Framework (2012), which allow material considerations to indicate a decision other than in accordance with the development plan (including the made Neighbourhood Plan).

We welcome the reference to "heritage" in the Vision. However, as drafted, the Vision remains really a set of aims or higher-level objectives or guiding principles rather than a vision of how the community would like to see their parish or village or neighbourhood at the end of the Plan period (or even further ahead).

We welcome and support Objectives SINDP OB1 and SINDP OB7.

We have assessed the proposed housing allocation in Policy SINDP7 against our records of designated heritage assets. There are no designated heritage assets on the site, it is within the setting of the Grade II listed Fry's Farmhouse. However, we consider that the impact on the significance of the Farmhouse would be low.

In Policy SINDP8, we suggest that the first criterion (i) should read "*(i) is compliant with the other policies of the development plan*".



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We welcome criterion (vii) regarding heritage assets and their settings in Policy SINDP9.

We continue to welcome the description of the historical development of the parish in the section on “Local Heritage” on page 29. However, we still consider that this description would sit better in the section on “About Stedham and Iping” with the “Local Heritage” section concentrating solely on the historic environment and heritage assets of the parish today, as the context and rationale for Policy SINDP16.

As previously commented, we expected to see reference to the existing designated heritage assets in the parish in this section – the 48 listed buildings and 14 scheduled monuments in the parish identified on the National Heritage List for England and the two Conservation Areas. We would welcome a description of the special interest of the Conservation Areas (the reason for their designation), the date of their designation, whether or not those designations have been reviewed and whether or not Character Appraisals or Management Plans have been prepared for either of them.

We welcome the identification of locally important heritage assets as we believe that non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity. However, although the text refers to 27 buildings, groups of buildings or structures, Policy SINDP16 lists 34.

We welcome, in principle, Policy SINDP16, although there is a danger in listing the Parish Heritage Assets in the policy itself as the policy might be construed as applying only to those identified assets, thus precluding the application of the policy to any future Parish Heritage Assets that may be identified. We would therefore suggest listing the assets in the supporting text or in an appendix to the Plan, and removing the reference to SINDP Map from the policy.

We consider that this policy and the list of Parish Heritage Assets, and Policy SINDP17 and SINDP18, which we welcome, partly fulfils the guidance of National Planning Practice Guidance that “... *where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions*”.

However, as previously advised, to completely accord with this guidance, reference should be made to non-designated archaeological remains. The Guidance notes that “*The local Historic environment record and any local list will be important sources of information on non-designated heritage assets*”. Have the Chichester Historic Environment Record (and West Sussex Historic Landscape Character Assessment) been consulted, the former for non-scheduled archaeological sites, some of which may be of national importance ?



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The definition of "Conservation Area" in the Glossary is not quite correct. Conservation Areas are defined in Section 69 of The 1990 Planning (Listed Buildings and Conservation Areas) Act as "*an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance*".

We previously noted a number of references to character throughout the Plan and explained that Historic England considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan.

Characterisation studies can also help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change. Has there been any characterisation of the plan area ?

Paragraph 58 of the National Planning Policy Framework (2012) states "*...neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics*". We note that the Plan does not contain any such policies and we are not aware that there is the required understanding and evaluation of the area's defining characteristics.

Has there been any or is there any ongoing loss of character, particularly within the Conservation Areas, through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc ?

The 2018 Historic England Heritage at Risk Register includes the Bowl Barrow at Fitzhall Rough. The Register does not include Grade II listed secular buildings outside London, but we believe that the National Park Authority commissioned a survey of Grade II listed buildings within the Park. Are any listed buildings within the parish identified as being at risk in that survey ?

We hope you find these comments helpful. Should you wish to discuss any points within this letter, or if there are particular issues with the historic environment in Stedham and Iping please do not hesitate to contact us.

Thank you again for consulting Historic England.

Yours faithfully,

[Redacted Signature]

Martin Small  
Principal Adviser, Historic Environment Planning  
(Bucks [Redacted] Downs National Park and Chichester)  
E-mail [Redacted]



Historic England [Redacted]

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Respondent Reference:	RI4
Organisation or Individual:	Mr & Mrs Matthews
Agent Details:	Kerry Simmons, Genesis Town Planning

Stedham with Iping Parish Council

Stedham with Iping Neighbourhood  
Development Plan -Submission  
Document

Regulation 16 Consultation

Representations submitted on behalf of:

Mr & Mrs K Matthews

January 2019



## 1.0 INTRODUCTION AND BACKGROUND TO REPRESENTATIONS

### Introduction

- 1.1 These representations on the Stedham with Iping Submission Neighbourhood Plan have been prepared by Genesis Town Planning on behalf of Mr and Mrs K Matthews. Mr and Mrs Matthews have a freehold interest in land known as The Rectory Field, Stedham which has been allocated as a Local Green Space in Policy SINDP4 (Site (v) of the Submission Neighbourhood Plan. The land is approximately 5.3ha in area.
- 1.2 We **object** to the allocation of the Rectory Field as a Local Green Space and disagree with the Parish that the allocation is justified against National Planning Policy. As a result we are firmly of the view that unless the site is removed from the list of Local Green Spaces, the Submission Neighbourhood Plan will fail the basic conditions for plan preparation set out in Schedule 4B of the 1990 Town and Country Planning Act.

### Background to Representations

- 1.3 We submitted representations to the earlier Pre Submission Plan **objecting** to the designation of The Rectory Field as a Local Green Space in the Neighbourhood Plan. We objected for the following reasons:
- 1.4 First, the inclusion of Rectory Field as a Local Green Space had not been properly justified by the Parish Council in the background 'Review of Open Spaces and Views' document comprising part of the evidence base for the Neighbourhood Plan.
- 1.5 Second, we pointed out that prior to the preparation of the Neighbourhood Plan, the South Downs National Park Authority included a Policy in its own Pre Submission Local Plan which identified Local Green Spaces. The Local Plan Policy SD47 allocated four Local Green Spaces at Stedham but land at The Rectory Field was not nominated by the Parish or included as a Local Green Space site by the Park Authority. Even if it had been nominated, the site would have failed to meet the tests for Local Green Space designation set out in the National Parks own study titled 'Local Green Spaces in the South Downs National Park'.
- 1.6 And third, in designating The Rectory Field, we said the Parish must have either ignored or misunderstood the tests for Local Green Space designation set out in National Policy in the NPPF and the on-line Planning Practice Guidance. For the purpose of this Neighbourhood Plan submitted before 24 January 2019, the policies in the original NPPF have to be applied, not policies in the Revised NPPF July 2018.

## The Consultation Statement

- 1.7 The Consultation Statement (July 2018) for the Neighbourhood Plan sets out the Parish Council's response to our objections (objector ref 28) and relevant pages are attached as **Appendix 1** to these Submission representations.
- 1.8 On the first issue, the Parish didn't respond to our point that Rectory Field was not justified as a Local Green Space against the selection criteria in the background 'Review of Open Spaces and Views' document in the evidence base for the Neighbourhood Plan. The Parish just says it is not an extensive area but we disagree and say 5.3 ha of land is extensive. The Parish also failed to say why the site held special significance to the local community of Stedham when it is not publicly accessible and has no recreational value.
- 1.9 The Parish explained that the reason Rectory Field was not put forward as a Local Green Space to the National Park Local Plan was because they didn't own or rent it. It has not explained why Rectory Field is justified as a Local Green Space in its Neighbourhood Plan when the National Park Authority hasn't included it as a Local Green Space in its Local Plan. Nor has it provided any justification why this non-conformity with the Local Plan is acceptable.
- 1.10 Regarding the National Policy tests for Local Green Space designation, all the Parish has said is that it considers the Local Green Space designation to be consistent with the NPPF as it allows the local planning of sustainable development. It has not addressed the national policy tests for Local Green Space designation in paragraph 77 of the NPPF whatsoever.
- 1.11 As currently drafted the Plan will therefore fail the basic conditions because 1) it is in conflict with national policy in the NPPF and the PPG and 2) is in conflict, rather than in conformity with, the strategic policies of the South Downs National Park Local Plan.
- 1.12 The Rectory Field should therefore be removed from the list of Local Green Spaces in Policy SINDP4 prior to the Neighbourhood Plan proceeding to Examination.

### 2.0 POLICY CONSIDERATIONS FOR THE PROPOSED LOCAL GREEN SPACE

#### The Basic Conditions

- 2.1 The Localism Act 2011 inserts provisions into the Town and Country Planning Act 1990 (“the Act”) in relation to neighbourhood development orders and into the Planning and Compulsory Purchase Act 2004 in relation to neighbourhood development plans. Paragraph 8(2) of Schedule 4B of the 1990 Act sets out the basic conditions a Neighbourhood Plan must meet and which an examiner must consider before it can go to referendum. The statutory test is:
- Having regard to national policies and advice, whether it is appropriate for the Neighbourhood Plan to be made
  - Having special regard to the desirability of preserving any listed building or its setting or the character or appearance of any Conservation Area
  - Contribute to the achievement of sustainable development
  - Be in general conformity with the strategic policies of the development plan for the area
  - Be compatible with the European Union (EU) and European convention on human rights (ECHR) obligations
- 2.2 In our view, the Submission Neighbourhood Plan does not meet the above basic conditions 1 and 4 as it does not pay regard to national policy for designating Local Green Space and is not in conformity with National Park Local Plan policy for Local Green Space either.

#### National Planning Policy Framework

- 2.3 The National Planning Policy Framework (NPPF) was reviewed in July 2018 after the last Pre Submission Plan consultation. Paragraph 214 of the new NPPF confirms that ‘the policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019.
- 2.4 For the purpose of Local Green Space designation, guidance at Paragraphs 76-77 of the original NPPF therefore remains relevant. Paragraph 76 states that through local and neighbourhood plans communities can identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.



2.5 The criterion for designation is set out in paragraph 77. It states that Local Green Space designation should only be used where:

**a) The green space is in reasonably close proximity to the community it serves;**

**b) The green space is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and**

**c) Where the green area concerned is local in character and is not an extensive tract of land.**

2.6 As we have pointed out, the inclusion of Rectory Field simply does not meet these tests and all tests have to be complied with to justify its designation. The site is a vacant field and has no historic significance, no recreational value as it's not publically accessible, is not a recognised biodiversity site such as a SSSI or SPA or a Site of Interest to Nature Conservation (SINC). Above all 5.3 ha of land on any view, is an extensive tract of land.

### Planning Practice Guidance

2.7 The on line Planning Practice Guidance (PPG) provides further guidance on Local Green Space designation. It advises for instance that where land is already protected by national designations such as National Park then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.

2.8 It states there are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed.

2.9 We say that a 5.3ha field in relation to the size of Stedham is excessive and bearing in mind paragraph 77 of the NPPF this has to defeat any claim for Green Space designation.

### The Emerging South Downs National Park Local Plan

2.10 The South Downs Local Plan has reached Examination. At Pre Submission Stage, **Policy SD47** identified Local Green Spaces across the Plan area including at Stedham. At this time 4 areas were identified for Stedham at i) Stedham Sports Ground, ii) Stedham Recreation Ground (Village Green), iii) Land at Common View (Allotment Gardens and iv) Playing Field Land at Common View. Rectory Field was not a proposed Local Green Space.

- 2.11 Main Modifications to the Local Plan (MM19) have deleted all the Local Green Spaces as they are being progressed in the respective Neighbourhood Plans. There is no commentary on Rectory Field but paragraph 7.264 of the Pre Submission Plan explained that the Local Green Spaces were all selected because they were regarded as demonstrably special to the local community and followed assessment in an evidence based Study for the Local Plan titled 'Local Green Spaces in the South Downs National Park'.

### Local Green Spaces in the South Downs National Park (September 2017)

- 2.12 The Study outlined the process taken in the evaluation of Sites nominated for Local Green Space designation in the emerging South Downs Local Plan bearing in mind national and local policy considerations and the methodology used by the Authority. The National Park's methodology for evaluating the sites was carried out in accordance with the NPPF tests prior to its revision in 2018.
- 2.12 Applying the tests, Rectory Field was not considered appropriate for inclusion as a Local Green Space in its Local Plan.

### A Review of Open Spaces and Views by Stedham with Iping Parish Council

- 2.13 The Parish has however retained Rectory Field as a Local Green Space in its Submission Neighbourhood Plan. The explanation to Policy SINDP4 states that the inclusion of sites as Local Green Spaces must be:
- Reasonably close proximity to the community they serve,
  - Demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife, and
  - Local in character and not an extensive tract of land.
- 2.14 The full assessment of Rectory Field is contained within the 'Review of Open Spaces and Key Views' document (November 2017) comprising part of the evidence base for the Neighbourhood Plan.
- 2.16 The Assessment Summary for Rectory Field in the Open Spaces and Key Views document is attached as **Appendix 2**. It concludes:
1. The site is reasonably close to the community it serves bordering the central and west parts of the village.
  2. It is special and holds local significance because it provides important open and uphill views from the surrounding houses and up Sandy Lane from The Street. It borders the Conservation Area forming an important green boundary and setting the village in its location amidst agricultural land.

3. It is said to be local in character bordering a large part of the village and is not an extensive tract of land;
4. It acknowledges that Rectory Field is not actively and currently used by the local community as it is privately owned agricultural land.

### Response of Genesis Town Planning

- 2.17 The Assessment Summary for Rectory Field has not been updated since November 2017. The Parish has not reflected on our Pre Submission Neighbourhood Plan Objections and Rectory Field has simply been retained as a Local Green Space in the Submission Plan.
- 2.18 We maintain that the site does not meet the national policy considerations for selection as it is on any view, an extensive tract of land. The reasons given why it holds special significance to the local community of Stedham does not hold up to scrutiny either. It is not publically accessible and its special qualities will not therefore extend to any recreational value. The site is already part of the designated National Park and no justification has been given what additional value the Local Green Space designation offers the village.
- 2.19 All three tests for Local Green Space designation in paragraph 77 of the original NPPF have to be met and Rectory Field in our view only meets the first test that it is in reasonably close proximity to the community it serves.
- 2.20 In short we believe the site has been identified as a Local Green Space simply as an attempt to undermine any future development value as it has been previously been considered as a modest residential allocation.

**3.0 THE FAILURE OF THE NEIGHBOURHOOD PLAN TO MEET THE BASIC CONDITIONS FOR ITS PREPARATION**

3.1 In our view, the Submission Neighbourhood Plan does not meet the Basic Conditions 1 and 4 as it does not pay regard to national policy for designating Local Green Space and is not in conformity with National Park Local Plan Policy for Local Green Space.

**Test 1 – Compliance with National Policy**

3.2 The Basic Conditions Statement is dated July 2018. The Table on page 4 alleges the Submission Neighbourhood Plan is in conformity with the first Basic Condition, namely that it has regard to national policies and advice. With regard to Policy SINDP – Policy 4 the Statement states:

SINDP Policy 4	Local Green Space	NPPF para 7, 76, 77 and 78	Protects spaces that comply with NPPF criteria and provide a social role within the community.
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3.3 We disagree with the Parish Council that the Submission Neighbourhood Plan meets this Basic Condition as it is not in conformity with paragraph 77 of the NPPF.

3.4 For a Local Green Space to be justified Paragraph 77 requires land to be demonstrably special to a local community, holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; be local in character and not be an extensive tract of land.

3.5 As we have pointed out, the inclusion of Rectory Field simply does not meet these tests and all tests have to be complied with to justify its designation. The site is a vacant field and has no historic significance, no recreational value as it's not publically accessible, is not a recognised biodiversity site such as a SSSI or SPA or a Site of Interest to Nature Conservation (SINC). Above all 5.3 ha of land on any view, is an extensive tract of land.

**Test 4 – Conformity with the Strategic Policies of the Development Plan**

3.6 The Submission Neighbourhood Plan does not conform to the South Downs Local Plan (Examination Version). The Plan has not allocated Rectory Field as a Local Green Space. The Park Authority never considered the site to be justified as a Local Green Space in the Pre Submission Version Policy SD47 bearing in mind the tests for designation in national policy and its own methodology in its study 'Local Green Spaces in the South Downs National Park'.

### Recommendation

- 3.7 As drafted, the Stedham with Iping Neighbourhood Plan does not meet the 'Basic Conditions' for Neighbourhood Plan preparation. It fails the Basic Conditions because 1) it conflicts with national policy for Local Green Space designation in the NPPF and the PPG; and 2) conflicts with the methodology for Local Green Space designation in the evidence base for the National Park Local Plan. If retained in the Neighbourhood Plan it would therefore conflict with the strategic policies of the development plan for the area.
- 3.8 As set out in the representations from NFU dated 3 January 2019 it is generally recognised that a local green space designation on the whole 5.3 ha site is not justified. A modest residential allocation on part of Rectory Field could however deliver associated open space and retain the agricultural land on the remainder.
- 3.9 **Appendix 3** is an extract from the Parish Council Landscape Review of Potential Sites for development in the Neighbourhood Plan. Rectory Field is Site 3 and the Landscape Study states that it is well contained by the existing settlement along its eastern and southern boundaries and:
- '...has some limited potential in the south east corner of the site which may be considered appropriate in wider landscape terms. This area is bounded by the existing settlement and by the rising ground to the west and would be visually contained in long distance views from the wider landscape.'**
- 3.10 The Plan ref 1176/SK03 Rev 01 attached at **Appendix 4** shows an illustrative area which could be developed for modest residential allocation. Plan ref 1176/SK02 Rev 01 also attached at **Appendix 4** offers an alternative location for a modest residential allocation accessed off Common View which would offer a natural extension to the built up area.
- 3.11 **The Rectory Field should therefore be removed from the list of Local Green Spaces in Policy SINDP4 and the Examiner reconsider part of the site as a smaller housing allocation with associated open space and the remaining land at Rectory Field retained as agricultural land. We reserve the right to attend the Neighbourhood Plan Examination if one is held to make these points to the Examiner in person.**

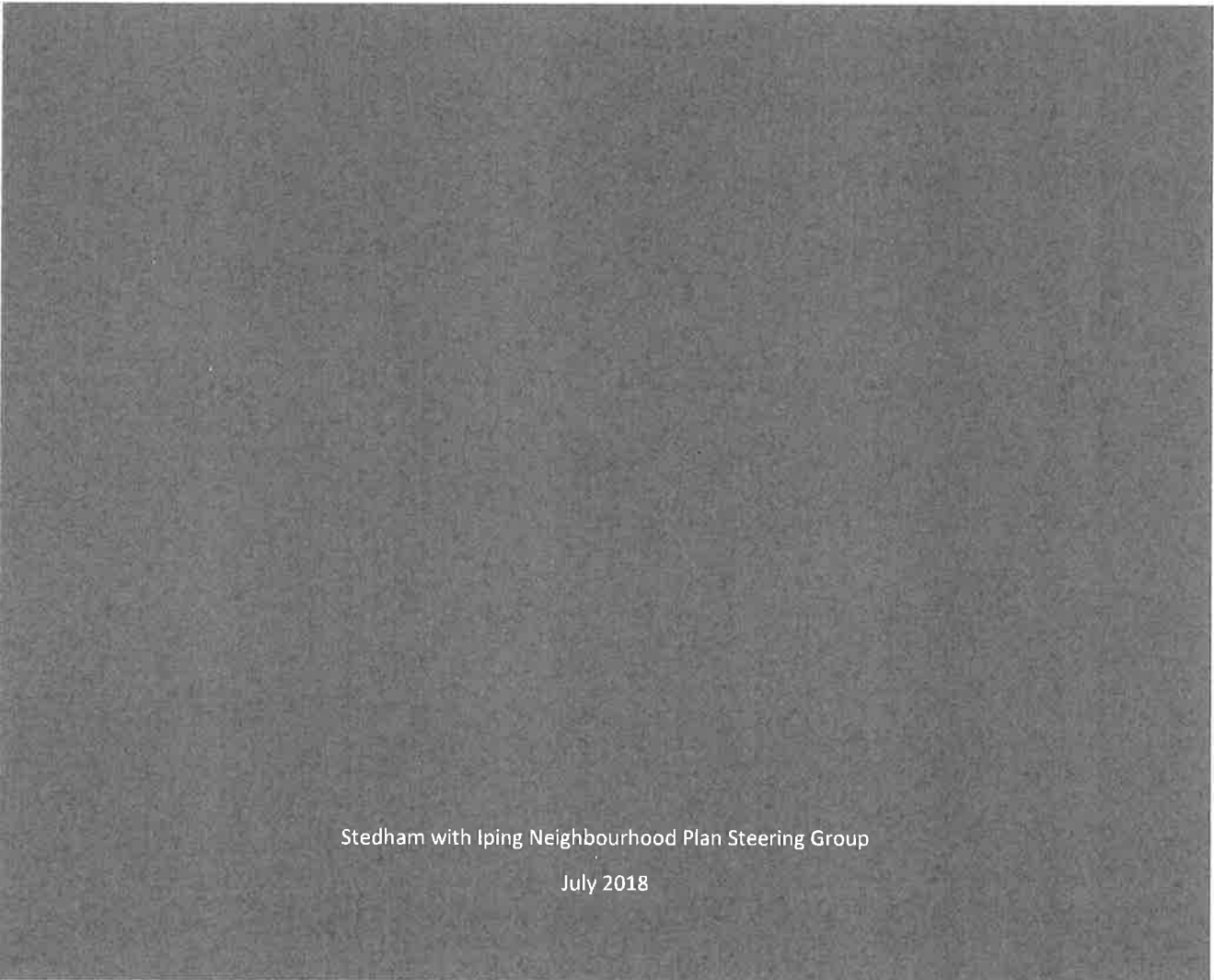
APPENDIX 1

The Parish Council's Response to Objector Ref 28 Comments at Pre Submission Stage

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STEDHAM WITH IPING  
NEIGHBOURHOOD PLAN  
CONSULTATION  
STATEMENT



Stedham with Iping Neighbourhood Plan Steering Group

July 2018

- The additional site included at West of West Lodge had more comments against than in favour. Those in favour liked the site because it was aiming to deliver houses for local people in need, such as the affordable elderly and starter homes; rather than for its location. Following discussion with SDNPA it was agreed to withdraw this site and instead provide for these houses through a Local Community Land Trust on the Sawmills site, with the proviso that the number of dwellings on this site would now be 'Up to 16' which would be in general conformity with the updated emerging Local Plan. As a result of this the West of West Lodge allocation proposed in the Reg.14 plan under SINDP8 was deleted.
- The SDNPA made a few comments on a number of policies and where appropriate these suggestions have been incorporated.
- SDNPA discussed the Settlement Boundary which differs in small ways from theirs around the settlement of Stedham. The principle difference relates to the Sawmills site and following support for SINDP1 by other responders we agreed we would not be altering this policy. SDNPA also suggested we include gym equipment as part of a village trail, this has been addressed by the inclusion in SINDP6.
- We had some helpful feedback from Historic England who were supportive of many of our policies. Where possible their suggestions have been incorporated.
- Feedback from the Environment Agency, Highways England and Southern Water have also been supportive.
- Feedback from the landowner and the NFU in regard to the Local Green Space designation of Rectory Field was considered. However it was felt there was sufficient grounds for keeping this in SINDP4.
- Feedback against the Local Community Space designation of Land between the A272 and the Rotherhill Nursery track, which had elicited no positive support, led to this space being removed.
- Feedback from Natural England and the Sussex Wildlife Trust in respect of biodiversity, native planting and protection of the SSSI have been incorporated where possible. However those issues already included in the emerging Local Plan have not been replicated in the SINDP.



Response No.	Lives in the parish OR Organisation?	Document	Refers to...	VERBATIM COMMENT	SIPC RESPONSE	
28	Genesis for Rectory field landowners	Local Green Spaces	SINDPA, page 14	and any potential risk can be assessed through a desk-top archaeology study.		
				School Access	<i>The NP plan states as an objective: 'Ensure continued accessibility to the drop-off area for Stedham Primary School on the "old" A272 and for the Walking bus which currently uses the path at the side of the sawmill'. There is no reason that a residential development would affect this objective. In fact, children could walk safely through the new open development rather than through the woods.</i>	Noted
				Footpaths	No public footpath or bridleway is affected by the development of the sawmill site. Development of the site offers opportunities to improve connectivity through the village with cycle and pedestrian routes through the site. There is also the opportunity to enhance the outlook from the existing footpaths.	Noted
				Access	The sawmill site has easy and direct access to the A272 and to local bus services. Improvements to the site access have already been agreed with the highway authority and are deliverable (albeit that these will be much less than those required to serve an employment use). The site's development will not affect the drop off site for the school and potentially can improve pedestrian and cycle links.  Accessing the development from the A272 will not increase the traffic in School Lane or add to the parking pressure.  The land owners' land abuts the Highway land; there is no ransom strip.	noted
				Consultation	See above explanation of process and former sawmill site under the first section of this Consultation Form: 'Comments on the neighbourhood plan'  The form issued by the PC for comment, does not contain any specific topic heading for housing, housing need or supply or relationship with National Park objectives. A fundamental element of any plan making should include these topic areas for consideration and comment and are necessary for the NP to be sound	noted  Noted, these issues were raised in the Parish Questionnaire. The SINDP is in conformity with SDNPA emerging Local Plan in terms of housing,
				These representations on the Stedham with Iping Pre Submission Neighbourhood Plan have been prepared by Genesis Town planning on behalf of Mr and Mrs K Matthews. Mr and Mrs Matthews have a freehold interest in land known as The Rectory Field, Stedham which has been allocated as a draft Local Green Space in Policy SINDP4 (Site (v) of the Pre Submission Neighbourhood Plan.  We object to the designation of The Rectory Field as a Local Green Space in the Neighbourhood Plan for the following reasons.  First, the inclusion of Rectory Field as a Local Green Space has not been properly justified by the Parish Council in the background 'Review of Open Spaces and Views' document comprising part of the evidence base for the Neighbourhood Plan.  Second, prior to the preparation of the Neighbourhood Plan, The South Downs National Park Authority included a Policy in its own Pre Submission Local Plan which identified Local Green Spaces. The Local Plan Policy SD47 allocated 4 Local Green Spaces at Stedham but land at The Rectory Field was not nominated by the Parish or included as a Local Green Space site. Even if it had been nominated, the site would have failed to meet the tests for Local Green Space designation set out in the National Parks own study titled 'Local Green Spaces in the South Downs National Park'.  Third, in designating The Rectory Field, the Parish have either ignored or misunderstood the tests for Local Green Space designation set out in National Policy in the NPPF and the on-line Planning Practice Guidance.	Noted  see comment below  see comment below  see comment below	

Response No.	Lives in the parish OR Organisation?	Document	Refers to...	VERBATIM COMMENT	SIPC RESPONSE
				<p>The inclusion of The Rectory Field as a Local Green Space in the Pre Submission Neighbourhood Plan Policy SINDP4 (Site (v)) is therefore fundamentally flawed and unless it is removed from the Neighbourhood Plan Policy, it runs the risk of failing the 'basic conditions' for Neighbourhood Plan preparation as set out in Schedule 4B of the 1990 Town and Country Planning Act.</p> <p>As currently drafted the Plan would fail the basic conditions because 1) it would be conflict with national policy in the NPPF and the PPG and 2) be in conflict, rather than in conformity with, the strategic policies of the development plan for the area.</p> <p>The Rectory Field should therefore be removed from the list of Local Green Spaces in Policy SINDP4 prior to the Neighbourhood Plan proceeding to Submission.</p> <p>The Localism Act 2011 inserts provisions into the Town and Country Planning Act 1990 ("the Act") in relation to neighbourhood development orders and into the Planning and Compulsory Purchase Act 2004 in relation to neighbourhood development plans. Paragraph 8(2) of Schedule 4B of the 1990 Act sets out the basic conditions a Neighbourhood Plan must meet and which an examiner must consider before it can go to referendum. The statutory test is:</p> <p>Having regard to national policies and advice, whether it is appropriate for the Neighbourhood Plan to be made</p> <p>Having special regard to the desirability of preserving any listed building or its setting or the character or appearance of any Conservation Area</p> <p>Contribute to the achievement of sustainable development</p> <p>Be in general conformity with the strategic policies of the development plan for the area</p> <p>Be compatible with the European Union (EU) and European convention on human rights (ECHR) obligations</p> <p>The National Planning Policy Framework (NPPF) (paragraph 7) explains that one of the three dimensions to sustainable development requires the planning system to perform an environmental role which amongst other things requires it to contribute to and protect and enhance the natural built and historic environment.</p> <p>Paragraphs 76 -78 deals with Local Green Space. It advises that in preparing Neighbourhood Plans green areas of particular importance to communities can be designated as Local Green Space. Areas to be identified should however be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.</p> <p>The designation should only be used:</p> <p>Where the Green Space is in reasonably close proximity to the community it serves;</p> <p>Where it is local in character and is not an extensive tract of land, and</p> <p>Where the space is demonstrably special and holds a particular local significance to a community for example, because of its beauty, historical interest, recreational value tranquillity or richness of wildlife.</p>	<p>Noted, however the SINDP has to be in general conformity with the emerging SDNPA Local Plan. It is not considered an extra green space is grounds for judging the SINDP to be 'in conflict'.</p> <p>Comment noted and it is considered that this field is consistent with the local planning of sustainable development</p>

Response No.	Lives in the parish OR Organisation?	Document	Refers to...	VERBATIM COMMENT	SIPC RESPONSE
				<p>The online Planning Practice Guidance (PPG) provides further guidance on Local Green space designation. It advises for instance that where land is already protected by national designations such as National Park then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.</p> <p>It also states there are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 77 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate.</p> <p>The South Downs Local Plan is in preparation. At Pre Submission Stage, Policy SD47 identified Local Green Spaces across the Plan area including at Stedham. At this time 4 areas were identified for Stedham at i) Stedham Sports Ground, ii) Stedham Recreation Ground (Village Green), iii) Land at Common View (Allotment Gardens and iv) Playing Field Land at Common View.</p> <p>Paragraph 7.264 of the Pre Submission Plan explained that the Local Green spaces were selected because they were regarded as demonstrably special to the local community and followed assessment in an evidence based Study for the Local Plan titled 'Local Green Spaces in the South Downs National Park'.</p> <p>Local Green Spaces in the South Downs National Park (Sept 2017)</p> <p>The Study outlines the process taken in the evaluation of Sites nominated for Local Green Space designation in the emerging South Downs Local Plan bearing in mind national and local policy considerations and the methodology used by the Authority. It explains that the nominated sites were put forward by Parish and Town Councils and local people as part of the Local Plan consultation at Preferred Options stage in 2015. Four sites were put forward for consideration at Stedham and in the event all were accepted by the National Park Authority as Local Green Space designations.</p> <p>At this time however, out of over 100 responses there were no nominations for the Rectory Field Site as a Local Green Space from Stedham with Iping Parish or any local residents. Nor has the draft Neighbourhood Plan explained what changed circumstances have occurred since 2015 for the Parish Council to now include it as a Local Green Space.</p> <p>The National Park's methodology for evaluating the sites followed the National Policy tests referred to in paragraph 2.4 of this Statement above.</p> <p>The first test requires sites 'to be in reasonably close proximity to the community it serves'. The methodology considered this to be a distance consistent with the Accessible Natural Green Space Standard produced by Natural England. For green spaces of 2ha or less it said they should be located within 300m which equates to roughly 5 minutes comfortable walking distance for a range of ages and abilities.</p> <p>The second test requires green space to be local in character and not an extensive tract of land. There is no clear definition of what constitutes an extensive tract of land other than that it must be local in character. The National Park therefore made a judgment as to whether sites were capable of fulfilling the spirit and purpose of the LGS designation considering their relationship and scale to the settlement to which it serves.</p>	<p>Comment noted, however this argument is flawed as there are Local Green Spaces as a designation within the SDNPA Local Plan, unaffected by the National Park designation</p> <p>Comment noted, however this piece of land is considered of local importance which is not the case for other open countryside in the parish.</p> <p>Noted however the other 4 sites were submitted to SDNPA by the Stedham with Iping parish council. The preparation of a draft SINDP has led to greater public consultation which has given rise to Rectory field as a green space in addition to the initial four.</p> <p>noted. However the Parish Council only put forward sites they owned, rented or were used by the Stedham Sports Association.</p> <p>Noted and it is considered that the field meets this test.</p> <p>noted</p>

Response No.	Lives in the parish OR Organisation?	Document	Refers to...	VERBATIM COMMENT	SIPC RESPONSE
				<p>On the last test the Park Authority assessed the special qualities of a site against beauty, historic significance, recreational value, tranquillity and richness of wildlife. At least one of the five criteria had to be met to justify inclusion as a Local Green Space. Two further criteria were added by the Park Authority. Public access was added as it could be a key factor in deciding whether a site was demonstrably special, for example with regard to its recreational value. Layers of designation was also added as National Policy asked that where protective designations were already on site, consideration should be given to what additional benefit LGS designation would offer.</p> <p>A Review of Open Spaces and Views by Stedham with Iping Parish Council</p> <p>Despite not nominating The Rectory Field as a Local Green Space in the National Park Local Plan consultation, The Parish has now chosen to allocate it as a Local Green Space in its own Pre Submission Neighbourhood Plan. The explanation to Policy SINDP4 states that the inclusion of sites as Local Green Spaces were considered against the same three national policy tests outlined above and used in the National Park Authority's own methodology. The Parish Council did not include the two further tests of public accessibility or layers of designation as used by the National Park.</p> <p>The Parish Council's assessment of The Rectory Field is set out in its Review of Open Spaces and Views which forms part of the evidence base for the Neighbourhood Plan. For the three principal tests for Local Green Space designation, it concludes:</p> <p>The site is reasonably close to the community it serves bordering the central and west parts of the village.</p> <p>It is local in character bordering a large part of the village and is not an extensive tract of land; and</p> <p>It is special and holds local significance because it provides important open and uphill views from the surrounding houses and up Sandy Lane from The Street. It borders the Conservation Area forming an important green boundary and setting the village in its location amidst agricultural land.</p> <p>It acknowledges that Rectory Field is privately owned agricultural land but considers this criterion of use by the local community only relevant to the designation of land as Local Community Space which is a separate typology of land covered by Neighbourhood Plan Policy SINDP5.</p> <p>In our view, the above assessment carried out by the Parish Council is flawed and has led to the inclusion of the Rectory Field as a Local Green Space in error. The site does not meet the national policy considerations for selection as it is on any view, an extensive tract of land. The reasons given why it holds special significance to the local community of Stedham does not hold up to scrutiny either. It is not publicly accessible and its special qualities will not therefore extend to any recreational value. The site is already part of the designated National Park and no justification has been given what additional value the Local Green Space designation offers the village.</p> <p>In any event, the Neighbourhood Plan has already identified four other Local Green Spaces at the village and a further four areas as Local Community Spaces. We find it hard to believe that the Rectory Field is required as a fifth Local Green Space given it is in private ownership and only offers limited value in providing open views from only a selected number of viewpoints from The Street up to Sandy Lane. These benefits do not extend to the village as a whole. And lastly, we do not believe that five Local Green Spaces and four Local Community Spaces are in any way commensurate to the needs of the village when only 18 additional dwellings have been allocated to it by the National Park Local Plan.</p>	<p>noted</p> <p>Noted. However the Parish Council only put forward sites they owned, rented or were used by the Stedham Sports Association.</p> <p>Noted, however the number of other green spaces also chosen is not a criteria for exclusion of one other site.</p>

Response No.	Lives in the parish OR Organisation?	Document	Refers to...	VERBATIM COMMENT	SIPC RESPONSE
				<p>In short we believe the site has been identified as a Local Green Space simply as an attempt to undermine any future development value as it has been previously been considered as a modest residential allocation. All these points are summarised in the next section.</p> <p>THE IDENTIFICATION OF LOCAL GREEN SPACE IN THE STEDHAM WITH IPING NEIGHBOURHOOD PLAN: We disagree with the Parish Council that The Rectory Field meets the necessary tests for Local Green Space designation. The Parish did not nominate it a Local Green Space when the South Downs Local Plan Authority invited 'bids' for sites in connection with its own Local Plan. And the site was not included as a Local Green Space in the Pre Submission Local Plan Policy SD47.</p> <p>Had the site been put forward for inclusion as a Local Green Space it would in our view have failed 4 of the 5 assessment criteria in the Local Plan background Paper 'Local Green Spaces in the South Downs National Park' in any event.</p> <p>Local Green Space Assessment by GTP</p> <p>As explained earlier in this statement at paragraphs 2.12-2.14, the Local Plan background paper identified potential Local Green Spaces using 5 assessment criteria.</p> <p>Test i) - Is it in reasonably close proximity to the community it serves?</p> <p>This test is met as Rectory Field is within 300m and roughly 5 minute walk from the north part of the village.</p> <p>Test ii) - Is it local in character and not an extensive tract of land?</p> <p>Land has to be local in character for it to be a potential Local Green Space. It follows that a large area of green space which is more than local significance will not fulfil the spirit and purpose of Local Green Space designation.</p> <p>In our view, Rectory field does not meet this test. It is by far the largest of the Local Green Spaces in the Stedham with Iping Neighbourhood Plan being very significantly larger than the other 4 Sites.</p> <p>To benchmark the 'Extensive Tract of Land' test, we have reviewed the size of other sites which the National Park Authority included as Local Green Spaces in its Local Plan. A copy of the Settlement Plans from the Local Plan background study accompanies these representations as Annex 1. It is telling that there are no other sites of a comparable size to Rectory Field in a similar sized settlement to Stedham that have been included as Local Green Space by the National Park Authority. On the other hand, there are many sites of a similar size or even smaller e.g. LGS 14 and 16 at Selbourne, LGS 95 at East Dean &amp; Friston, LGS42 and 44 at Hambledon and LGS 70 and 85 at Buriton which have been excluded as Local Green Spaces because they were all considered to be too large. This test is not met.</p> <p>Test iii) - Is it special and holds local significance because of its beauty, historic significance, recreational value, tranquillity and richness of wildlife?</p>	<p>Noted. However other sites in other Parishes may not be comparable and in any case their exclusion was by the SDNPA not an independent examiner. SINDP does not include any other fields surrounding the villages of Iping or Stedham because they are not considered significantly special. This is not the case for Rectory field.</p>

Response No.	Lives in the parish OR Organisation?	Document	Refers to...	SIPC RESPONSE
			<p><b>Rectory Field</b> is described by the Parish in its 'Review of Open spaces and Views document as privately owned agricultural land. Its natural beauty does not extend beyond this. It is alleged to provide important open and uphill views from the surrounding houses and up to Sandy Lane from the Street. These 'important views' however are not shared by the wider community of Stedham. The field has no historic significance and is not a historically designated landscape. It has no recreational value because it is private agricultural land. It is not designated as a SSSI nor has any other biodiversity interest as it is agricultural land. It has some value in terms of tranquillity but even this is limited because of its location in close proximity to the village. This test is not met.</p> <p>Test iv) – Does the site have public access?</p> <p>Although not a requirement for Local Green Space designation, public access can be a key factor as to why the site may be considered demonstrably special, for example with regard to its recreational value. The National Park Authority added this as a further test. Although we understand that people use the land this is undertaken as illegal trespass and as such the land has no designated recreational value or legal public rights of access. Being private agricultural land, the test is not met.</p> <p>Test v) – Layers of Designation?</p> <p>National policy asks that, where there are already protective designations on site, consideration is given to what additional benefit Local Green Space designation would offer. Rectory Field is of course already part of the protected landscape in the South Downs National Park. It also borders the Conservation Area of Stedham and therefore if any development was to be considered for the site in the future, the impact of this on the setting of the Conservation Area would be a legitimate consideration in any event. The Parish has not identified what additional protection the Local Green Space would offer. In our view, this test is not met.</p> <p>Recommendation</p> <p>As drafted, the Stedham with Iping Neighbourhood Plan does not meet the 'Basic Conditions' for Neighbourhood Plan preparation. It fails the Basic Conditions because 1) it conflicts with national policy for Local Green Space designation in the NPPF and the PPG; and 2) conflicts with the methodology for Local Green Space designation in the evidence base for the National Park Local Plan. If retained in the Neighbourhood Plan it would therefore conflict with the strategic policies of the development plan for the area.</p> <p>As set out in the representations from NFU it is generally recognised that local green space could be secured and formalised as part of a modest residential scheme. If as a result of the pre-submission plan, the Parish wanted to reconsider Rectory Field as a residential site in the next submission plan we would be happy to work with the Neighbourhood Plan Steering Committee to agree broad parameters for its future development and extent of associated green space.</p> <p>The Rectory Field should therefore be removed from the list of Local Green Spaces in Policy SINDP4 prior to the Neighbourhood Plan and reconsider the site as a smaller housing allocation with associated open space proceeding to Submission. We reserve the right to attend the Plan Examination if one is held to make these points to the Examiner in person.</p>	<p>Comment noted however the value in providing views and setting the village in its rural position are considered important enough to gain the designation. Any one view by its nature is only enjoyed regularly by those living in its vicinity.</p> <p>There are permissive paths, as well as a large percentage of housing which joins this space.</p> <p>The value of this field lies in the position surrounded by village housing</p> <p>Noted however the green space designation is an indication of the value the village places on this field as an area of green space.</p> <p>Rectory field is not chosen in SINDP as a suitable site for residential housing. It remains outside the Settlement boundary.</p>

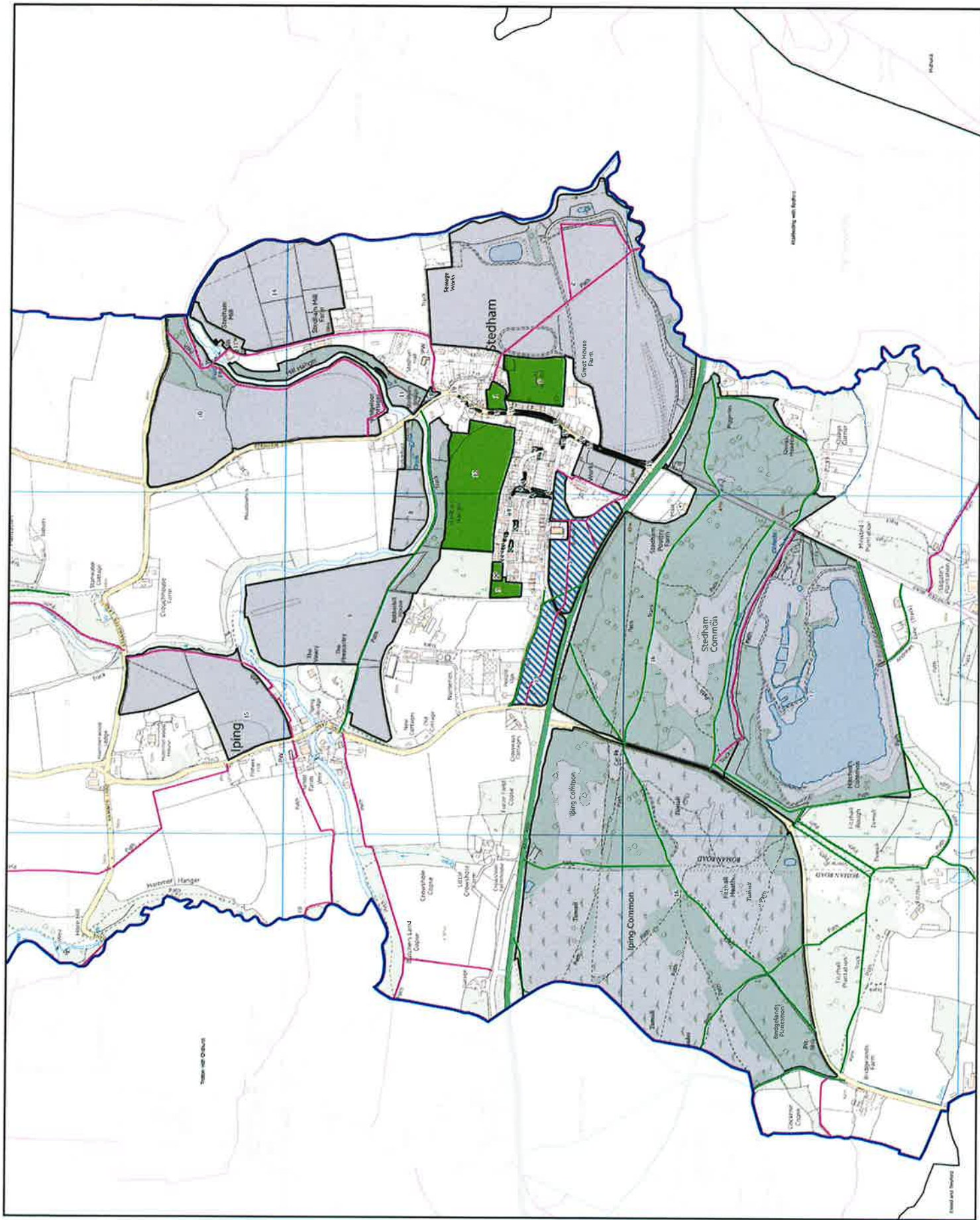
## APPENDIX 2

Assessment Summary for Rectory Field in the Open Spaces and Key Views Document

Ref:	12	
Name/Location:	Rectory Field to the north of Sandy Lane and the Common View estate.	
Assessment criteria	Comments	Response
1. Reasonably close proximity to the community it serves	Yes. It borders central and western part of village.	✓
2. Demonstrably special to a local community and holds a particular local significance	This field provides important open and uphill views from the surrounding houses and up Sandy Lane from The Street. It borders the conservation area forming an important green boundary and setting the village in its location amidst agricultural land.	✓
3. The area is local in character and not an extensive tract of land	Yes. It borders the a large part of village and is not an extensive tract of land.	✓
4. Actively and currently used by the community	Privately owned agricultural land.	X
Summary / Conclusion	This space meets the criteria to be designated Local Green Space	



- Legend**
- Parish & Plan Boundary
  - Public Rights of Way
  - Footpath
  - Bridleway
  - Byway
- Conclusions of Open Space Assessments**
- Recommend designation as Local Green Space
  - Recommend designation as Local Community Space
  - No designation



## APPENDIX 3

The Parish Council Landscape Review of Potential Sites Extract

Our Ref: 02/752

Date: 20 November 2017



STEDHAM WITH IPING PARISH COUNCIL

## LANDSCAPE REVIEW OF POTENTIAL SITES FOR THE NEIGHBOURHOOD PLAN

The following review has been prepared by Philip Russell-Vick DipLA CMLI, Landscape Director of Enplan and a Chartered Landscape Architect with over 30 years' experience. He has worked extensively in areas of Landscape & Visual Impact Assessment, detailed design/implementation of landscape schemes, development strategies and masterplanning and in the coordination of EIA. He is one of the country's leading professional expert witnesses in the discipline of landscape and visual impact. He has appeared at over 80 Public Inquiries and public examinations across the UK.

The discussion (and subsequent) recommendation in relation to each site below considers the merits of each site in landscape terms. It does not take into account material considerations (that should be taken into account by the Steering Group when choosing sites) other than landscape & visual impact.

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### 1. Bridgelands Farm

Former group of large pre-fabricated agricultural barn buildings which, having been converted, are currently utilised as Use Class B8 (Storage and Distribution) and Sui-Generis Use (Non-Domestic Veterinary Clinic). As previously developed land this site evidently has some residential development potential but given that the site lies within the National Park such development would need to demonstrate that it protected and enhanced the landscape, i.e. be able to demonstrate an enhancement over the existing condition, in accordance with the requirements of the National Planning Policy Framework.

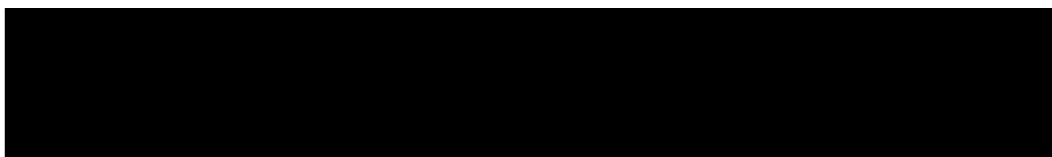
The site is exposed to views from the adjoining Ingram's Green Lane and longer views from the countryside and scarp of the Downs to the south-west. Consequently, any residential would need to be constrained to the current footprint of the existing built development both in terms of built footprint and the extent of buildings and hardstandings. Considerable care would need to be taken with the design, appearance and height of any new buildings, as well as with the design of external works, in order to minimise the effects of domesticating the landscape with garden boundaries and paraphernalia. The site's northern and western boundaries would require sensitive landscape treatment to soften the visual impact of the buildings.

**It is considered that a maximum of 5 detached/semi-detached units may be considered suitable on this site in landscape terms subject to careful design.**

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### 2. Stedham Sawmills

Land partially previously developed land currently used for storage and employment uses, some of which is outside, and a similarly sized area that is open and apparently disused, and which has historically benefited from outline planning permission for 2746 m<sup>2</sup> of B1 light industrial



employment uses and associated car parking and access. This planning permission is understood to have lapsed in September 2016.

The site has a well-concealed access from the A272 and is further screened by woodland to the west and north. The eastern boundary comprises a hedgerow with scattered mature trees that help partially screen the existing buildings and storage from views to the east in the summer months, i.e. from The Street. In the winter it is anticipated that these views are considerably more open and more of the existing storage and sawmill buildings would be visible.

The site's previously developed nature and its general containment suggest that in the context of the National Park this is a site of relatively low landscape susceptibility to new built development. Whilst the principle of planning policy to protect and enhance applies here, as it does to all of the land within the Parish, a case for meeting the policy test is likely to be more readily met here than at all of the other sites.

Buffer areas to protect mature trees along the western and northern boundaries would be required. The eastern boundary would require sensitive treatment, both in terms of new landscaping to provide further screening and the appearance of the elevation of new buildings, as seen in views from The Street. Well designed and landscaped a new 'elevation' would be an enhancement over the existing elevation and assist in improving the rural setting of the village.

Retention of the Public Rights of Way along the western and eastern boundaries respectively would be essential and the accesses to School Lane retained. These accesses should not be developed to provide general vehicular access. The amenity of users should be protected as far as possible with the new development not backing onto these routes.

**The SDNPA proposal for an allocation for between 16 and 20 residential dwellings plus 3000m<sup>2</sup> B1 Use is considered appropriate for this site in landscape terms.**

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### **3. Rectory Field**

A single large roughly rectangular field of rough pasture adjoining the built edge of Stedham along its eastern and southern boundaries. The other two boundaries are formed by Stedham Hangar. The land rises from south to north and also falls more steeply away to the east. Whilst the very southern and eastern edges of the site are well contained by the existing settlement but the rising contours of the site mean that the middle and northern parts are visually exposed from the south and east giving rise to mid and long distant views from Stedham Common and the scarp slope of the Downs. The wooded Stedham Hangar is a steep river cliff and the woodland is not of any great depth. Consequently development along the northern edge of the site would be visible through and between trees in views from the north.

The Iping-Stedham Rise is a highly sensitive area in landscape terms and provides separation between the settlements of Stedham and Iping. The site as submitted has very little capacity for development. There is some limited potential in the south-east corner of the site which may be considered appropriate in wider landscape terms. This area is bounded by the existing settlement and by the rising ground to the west and would be visually contained in long distance views from the wider landscape. It is noted however that localised impacts on existing dwellings that border, and some short distance views from within the village would incur significant visual impacts should any new development come forward in this location. Although there is no right to a private view in planning, effects on the visual amenity of residents should be taken into the planning balance.

**In landscape terms, this site is not appropriate for development.**

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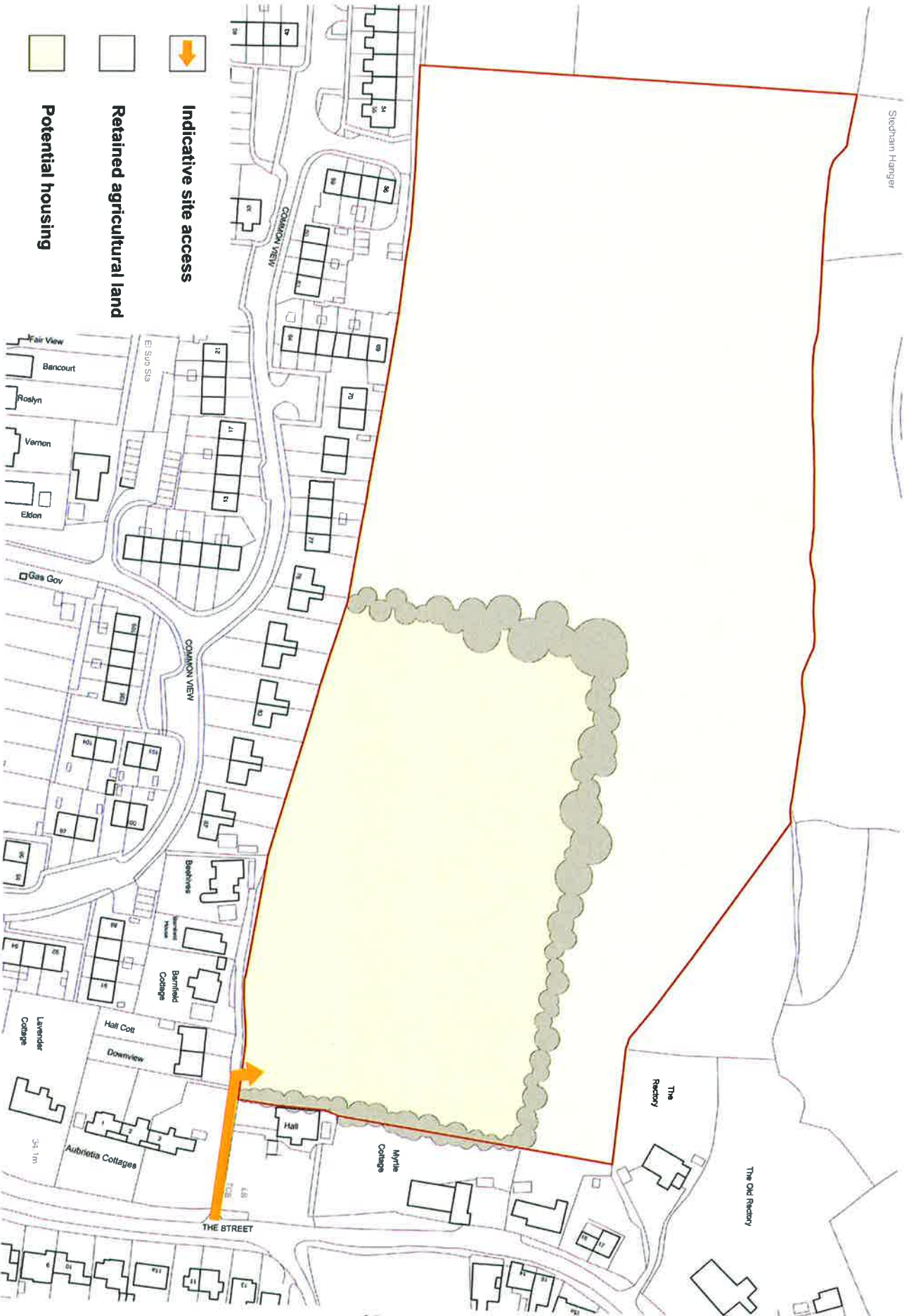
### **4. Land to rear of Sorrells**

## APPENDIX 4

Plan Ref 1176/SK03 Rev 01



Stedham Hanger



Indicative site access



Retained agricultural land



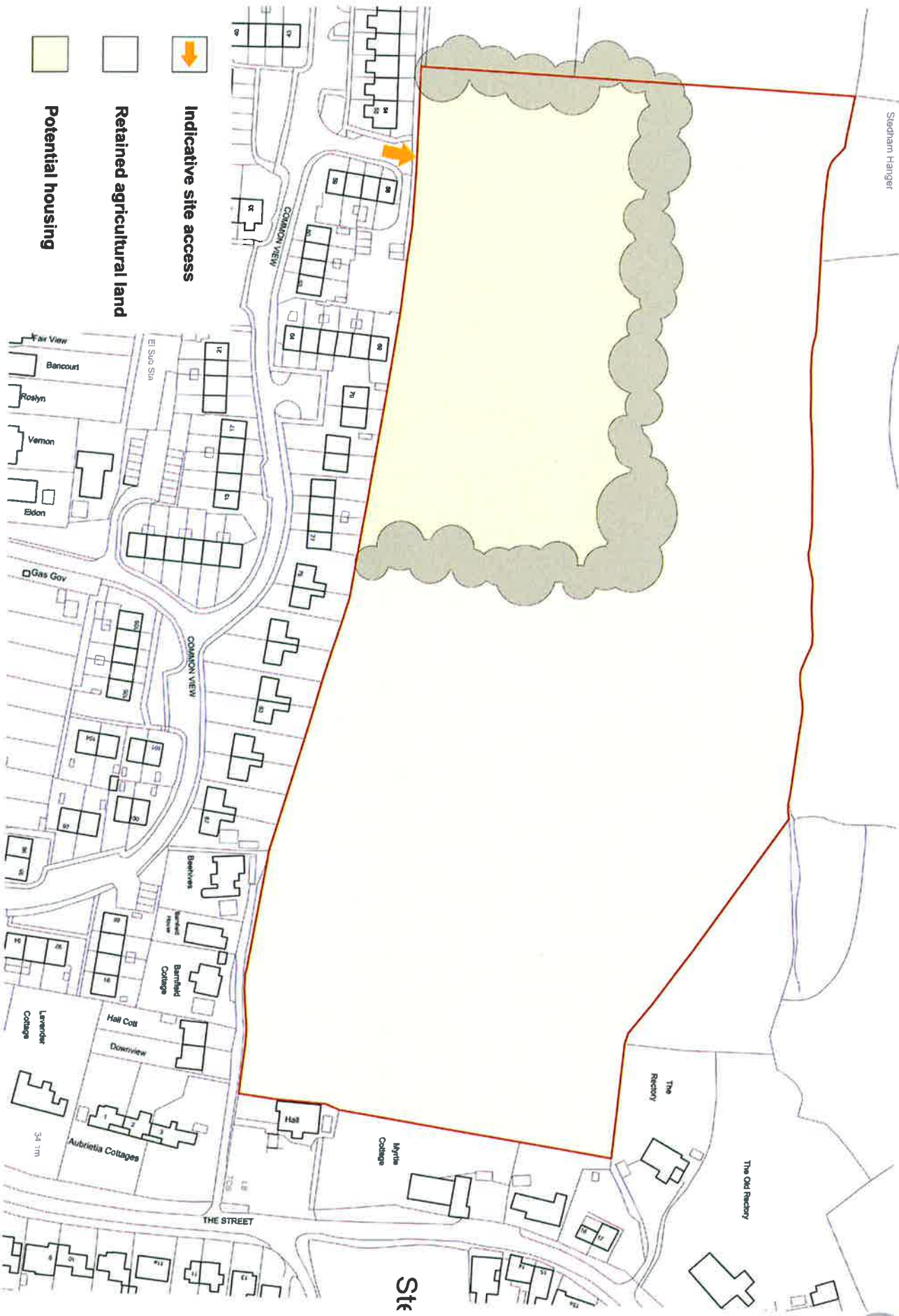
Potential housing

Location Plan - Option 2 1:1250@A3

Reactory Field Stedham

1176/SK03 Revision01

Stedham Hanger



-  **Indicative site access**
-  **Retained agricultural land**
-  **Potential housing**

Location Plan - Option 1 1:1250@A3

Rectory Field Stedham

1176/SK02 Revision01



By Email: [neighbourhood@southdowns.gov.uk](mailto:neighbourhood@southdowns.gov.uk)

31 January 2019

Dear Sirs

**Rectory Field, Stedham**

As the owners of Rectory Field Stedham, we write to register our opposition to the SIPC attempts to impose long term restrictions on any development of the above field. In reaction to this threat we have identified and instructed two professional bodies to act on our behalf to rebut the SIPC proposed designation, these being the National Farmers Union (NFU) and Genesis Town Planning.

We applaud most of the work done by SIPC in preparing the parish plan, especially in setting out their objectives. However, in examining these objectives for the local community we feel very strongly that a forward thinking parish council should reconsider and understand the benefits which our 'rectory field' could bring to those objectives.

We therefore aim to ensure that this land (bordering the village of Stedham on two sides) may at the correct time, and in line with the Local Plan and relevant planning legislation, be available for sensitive future development.




Yours faithfully

Keith & Pauline Matthews










-  **Indicative site access**
-  **Retained agricultural land**
-  **Potential housing**



-  **Indicative site access**
-  **Retained agricultural land**
-  **Potential housing**

Respondent Reference:	R15
Organisation or Individual:	Highways England
Agent Details:	N/A



[REDACTED]

---

**From:** Cleaver, Elizabeth [REDACTED]  
**Sent:** 01 February 2019 10:52  
**To:** Neighbourhood  
**Cc:** Planning SE  
**Subject:** Highways England response - Stedham with Iping Neighbourhood Development Plan 2018-2033 Reg 16 Consultation

**For the attention of:** Neighbourhood Planning Team

**Consultation:** Stedham with Iping Neighbourhood Development Plan 2018-2033 Regulation 16 Consultation

**Highways England reference:** #6358

Dear Sir/Madam

Thank you for notifying Highways England of this Regulation 16 Consultation on the Stedham with Iping Neighbourhood Plan.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and, as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs, as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN.

Highways England was previously consulted on the Regulation 14 version of the Neighbourhood Plan in March 2018 and raised no concerns on the assumption that the maximum housing and commercial provision within the Plan is not exceeded. We note that there are minor changes to housing and employment provision within the Plan in the Regulation 16 version dated September 2018.

Highways England's position remains that we offer no comments on the Stedham and Iping Neighbourhood Plan on the basis that the maximum housing and commercial provision within the Plan is not exceeded.

Thank you for consulting Highways England and please continue to consult us at [PlanningSE@highwaysengland.co.uk](mailto:PlanningSE@highwaysengland.co.uk).

Yours faithfully,

**Elizabeth Cleaver, Assistant Spatial Planning Manager**  
[REDACTED]

Web: <http://highwaysengland.co.uk/>

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Respondent Reference:	RI6
Organisation or Individual:	South Downs National Park Authority
Agent Details:	N/A

## 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 “<del>within the Settlement Boundary</del>” 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 1500m<sup>2</sup> 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) “<del>restricting direct pedestrian and cycle access to the A272 and the SSSI</del>” 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 1500m<sup>2</sup> 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. <a href="https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/">https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</a>	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: <del>Pre-submission version September 2017.</del> ”

	District Local Plan 1999 and the emerging South Downs National Park Local Plan: <del>Pre-submission version September 2017.</del>	
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”.

Respondent Reference:	R17
Organisation or Individual:	Natural England
Agent Details:	N/A

**From:** Pearson, Rebecca [REDACTED]  
**Sent:** 04 February 2019 11:27  
**To:** Neighbourhood  
**Subject:** Stedham with Iping Neighbourhood Plan-Urgent action

**Importance:** High

Dear Sir/Madam

**Stedham and Iping Site of Special Scientific Interest-Urgent Action Required**

I write with concern that the Stedham and Iping Neighbourhood Plan allocation SINDP7 – Stedham Sawmills makes no reference to the strict requirements for this site within the SDNP Local Plan. I refer you to our advice of 16 May 2016 as follows:

**Urgent amendments needed**

Natural England is of the opinion that the proposal is not in accordance with the emerging Local Development Plan, namely policy SINDP7 covering Stedham Sawmills, and SINDP13 covering Iping Common SSSI in the Stedham with Iping Neighbourhood Plan.

Natural England is concerned that the policy does not mention SD92 within the emerging Local Development Plan contained in the South Downs Local Plan Submission – Schedule of Changes – Appendix 5 which has clear requirements for any development of the Stedham Sawmills site. The current wording does not reflect policy SD92 or refer to it and we advise that this will need to be urgently amended to ensure that it complies with this key policy and will not deteriorously affect the Iping and Stedham SSSI.

It is of key importance that this is reviewed prior to any submission, Please contact me urgently to discuss this matter. Furthermore we are concerned that no specific policies are included pertaining to biodiversity and designated sites.

Kind regards

Rebecca Pearson  
Lead Adviser  
Sustainable Development Team

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Respondent Reference:	R18
Organisation or Individual:	Chichester District Council, Housing Officer
Agent Details:	N/A

**Memorandum**

**To:** Kevin Wright

**From:** Bryn Jones

**Ext:** [REDACTED]

**CC:** Nat Belderson

**Date:** 8<sup>th</sup> February 2019

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**Subject: Stedham with Iping Neighbourhood Plan – Regulation 16 submission consultation**

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Thank you for the opportunity to comment on the above neighbourhood plan. Please see comments below:

**Page 17-18: SINDP7 – Stedham Sawmills**

- This policy is unclear as to whether the scheme is to be totally delivered by a community land trust or just the affordable housing element. This needs to be clarified. It is my understanding that the policy cannot prescribe who a developer can dispose the affordable quota to on a market site. As such, this restriction should be removed. The neighbourhood plan supporting text could state that preference should be given to a CLT for disposal of the affordable units.
- Following my previous consultation at the regulation 14 stage, the local connection criteria from the removed site at Land West of West Lodge has been reinstated within SINDP7. This is not in line with the Council's adopted "Allocations Scheme".

Within planning, the requirement to allocate homes to households with a local connection only applies on exception sites, as it is an exception to policy. The local housing authority secures 100% nomination rights on affordable units which is secured within the S106 agreement. Any lettings are made in line with the Council's adopted Allocations Scheme.

It is the policy of CDC and its RP partners to operate a choice based lettings scheme. An allocation scheme is a legal requirement under the terms of Section 167 of the Housing Act 1996. It sets out the priorities and procedures for letting of all forms of affordable (social) housing and our nominations to the RP's. The scheme applies to existing RP tenants wanting to move (transfer) and to new applicants applying to the housing register for the first time.

The Council's adopted "Allocation Scheme" includes a "Rural Allocations Policy". When an existing affordable home within a rural area becomes available for re-let, preference will be given to households that:

1. Are able to demonstrate (to the reasonable satisfaction of the council) a local connection to the parish in which the property is located, and;
2. Have "reasonable preference" on the housing register (i.e. those households that are in bands A-C).



N.B All other eligibility requirements for the property (e.g. bedroom need) must be met. If no eligible households bid, the property will be allocated to households that has the greatest assessed housing need, regardless of local connection to the parish.

On 1<sup>st</sup> lets of all schemes CDC review the sensitivity of the site and in most cases devise a Local Lettings Plan with the Registered Provider; which considers the housing need near the time of letting and in some cases consider prioritising local households in bands A-D on 1<sup>st</sup> lets depending on the sensitivity and need.

CDC's Rural Allocations policy was devised to ensure that local priority is given "reason preference" but "not absolute priority over everyone else", as the House of Lords made clear in the case of R (on application of Ahmad) v. Newham LBC [2009]. S.166A(3)<sup>1</sup> only requires that people encompassed within that section are given "reasonable preference". It "does not require that they should be given absolute priority over everyone else"<sup>2</sup>. This means that an allocation scheme may provide for other factors than those set out in s.166A(3) to be taken into account in determining which applicants are to be given preference under a scheme, provided that:

- They do not dominate the scheme , and
- Overall, the scheme operates to give reasonable preference to those in the statutory reasonable preference categories over those who are not

The proposed local connection criteria set out within the policy would be in breach of the above statutory requirements to only give "reasonable preference". Furthermore policy SINDP7 states that if there is no one with a local connection to Stedham with Iping, it would then cascade out to:

- Woolbeding with Redford
- Rogate
- Trotton with Chithurst
- Elsted with Treyford
- Milland and Bepton

We would be concerned that if there no one eligible from Stedham with Iping or the surrounding parishes bid on the properties then they would be untenable and left empty. This would not be acceptable bearing in mind the large number of households on the housing register with a housing need in the district. It is therefore requested that that the local connection criteria be removed.

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<sup>1</sup> Previously s.167(2), which continues to apply to allocations by housing authorities in Wales

<sup>2</sup> Baroness Hale at para [18]

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**Page 20: SINDP8 – Unallocated residential development**

- Under residential development outside of the settlement boundary, specific reference should be made to the emerging South Downs National Park exception site policy SD29.

Kind regards

Bryn Jones  
Housing Enabling Officer  
Chichester District Council