South Downs
National Park Authority

Agenda Item 14
Report PC19/20-36

Report to	**Planning Committee**
Date	**16 January 2020**
By	**Director of Planning**
Title of Report	**Stedham with Iping Neighbourhood Development Plan Decision Statement**
Purpose of Report	**To agree the Examiner's recommended modifications to Stedham with Iping Neighbourhood Development Plan and publish these in the Authority's 'Decision Statement'.**

Recommendation: The Committee is recommended to

1) **Note the Examiner's Report and recommended modifications to make the Stedham with Iping Neighbourhood Development Plan meet the basic conditions as set out at Appendix 2 of the report.**

2) **Agree the 'Decision Statement' as set out at Appendix 2 of the report, which sets out the modifications that will be made to the Stedham with Iping Neighbourhood Development Plan in response to the Examiner's recommendations.**

1. Introduction and Summary

1.1 Stedham with Iping Parish Council (SIPC) submitted the Stedham with Iping Neighbourhood Development Plan (SINDP) to the South Downs National Park Authority (SDNPA) for examination on Monday 11 February 2019. An Independent Examiner was appointed to examine the Plan; this took place between initially in February 2019 by Mr Nigel McGurk. The NDP was paused due to the timetable of the South Downs Local Plan (SDLP), and the examination restarted in July 2019 following the adoption of the SDLP. The Examiner considered representations and determined that no public hearing was required. The Examiner has now issued his final report and concludes, that subject to a number of modifications, the SINDP can proceed to referendum. The SDNPA must issue a 'Decision Statement' setting out how the SINDP will be modified in response to the Examiner's Report.

2. Background

2.1 Stedham with Iping Parish Council (SIPC) are to be congratulated on progressing the SINDP to the final stage ahead of a community referendum. To reach this stage has required considerable commitment and hard work by local volunteers and members of the SIPC over the previous two years. The Examiner has commended the comprehensive approach in producing the SINDP as well as highlighting areas of excellent practice in the Plan's development.

2.2 The Stedham with Iping NDP covers the plan period 2018 to 2033 and has been prepared for a designated neighbourhood area (as shown in Appendix 1, which follows the Stedham with Iping parish boundary.)

2.3 The following stages in the preparation of the NDP have been completed. Links to all relevant Planning Committee reports are included at the end of this report and more detailed information on each stage is also on the Neighbourhood Planning pages on the South Downs National Park Authority website.

Stage	Detail
Designated a Neighbourhood Area	1 August 2017
Pre-submission consultation on the plan (Reg 14)	The SDNPA response to the Pre Submission consultation was agreed by Planning Committee on 10 May 2018
Submitted to SDNPA and published for consultation (Reg 16)	The SDNPA response to the Submission consultation.
Independent Examination	Undertaken by Mr Nigel McGurk in February and July - October 2019. Report issued October 2019 (**Appendix 2**).

3. Recommended modifications to the Stedham with Iping NDP to meet the Basic Conditions

3.1 The Examiner was appointed to assess whether the SINDP meets certain legal requirements for NDPs, known as the 'Basic Conditions', these state NDPs should:

i) Have regard to national policies and advice contained in guidance issued by the Secretary of State,

ii) Contribute to the achievement of sustainable development,

iii) Be in general conformity with the strategic policies contained in the development plan for the area,

iv) Not breach, and otherwise be compatible with, EU obligations.

3.2 The Examiner has now issued his report and identified a number of modifications which are necessary to ensure the SINDP meets the basic conditions. Officers have reviewed the Examiner's report in consultation with the SINDP steering group. The following key modifications are highlighted for Members;

- The neighbourhood plan originally had Policy SINDP7: Stedham Sawmill, it was expanding upon the South Downs Local Plan policy SD88, an allocation for 16 C3 dwellings, employment use and biodiversity enhancements. The examiner concluded that the policy had been "overtaken by events" and that some of the NDP policy wasn't justified by evidence, an absence of information or was contrary to the SDLP. The examiner deleted the policy but noted some of the text of the policy was put in the supporting text of the NDP.
- The Settlement boundary suggested by the parish council in the SINDP was not in conformity with the newly adopted SDLP. The SINDP did not fully reflect the boundary of the mixed use development site of Stedham Sawmills that is adopted in the aforementioned Local Plan, and therefore was considered not in general conformity with the development plan. As a modification to the SINDP during the examination period, the settlement boundary now includes all of the allocation at Stedham Sawmills.
- The Neighbourhood Development Plan allocates four Local Green Spaces that the examiner concluded were demonstrably special to the parish. One draft designation of 'Rectory Field' was taken out at examination stage due to the lack of evidence and therefore didn't meet the required policy tests.

3.3 Many of the Examiner's modifications are to bring clarity to the wording used and ensure a policy based approach that meets the needs of decision makers in applying the Plan when it is 'made'.

3.4 Details of each modification is contained in the Examiners Report **(Appendix 2)** with further info in the decision statement **(Appendix 3)**.

4. Decision Statement

4.1 The Regulation 14 and 16 stages of the neighbourhood plan making process offers those parties affected by the NDP the opportunity to make representations on the plan. That is not just the right to object but also to support proposals in the plan or make comments. This is followed by an examination and the issuing of a report (by an independent Examiner) containing a series of recommendations. The Neighbourhood Planning (General) Regulations 2012 state that a Local Planning Authority must then publish what actions will be taken in response to the recommendations of the Examiner. This is known as the 'Decision Statement'.

4.2 The Neighbourhood Plan Regulations impose no obligations for the examiner or the LPA to have to consult on the changes to the Plan which they are minded to accept. Those that do not endorse the plan have the chance to vote to reject it at referendum.

4.3 However, if the authority propose to make a decision which differs from that recommended by the examiner, it must notify relevant people and invite representations. Any representations must be submitted within six weeks of the local planning authority inviting representations. The Local Planning Authority may, if it considers it appropriate to do so, refer the issue to further independent examination. Once the period for representations is over, the Local Planning Authority must issue its final decision within five weeks. The submission version of the SINDP would then be revised and a Referendum would take place.

4.4 It is recommended that members accept the Examiner's modifications to the Stedham with Iping NDP and approve the Decision Statement as attached at Appendix 2.

5. Planning Committee

5.1 The Stedham with Iping NDP is being considered by Planning Committee as it forms part of the Development Plan for that part of the National Park located in the parish of Stedham with Iping.

6. Next steps

6.1 Following the publication of the Decision Statement, the Stedham with Iping NDP can proceed to referendum which will be organised by Chichester District Council. It is provisionally agreed that the referendum will be held on Thursday 26 March 2020. If over 50% of those voting are in favour of the NDP, then the Plan can be 'made' (adopted) by the SDNPA and will form part of the statutory Development Plan for Stedham with Iping parish.

7. Other Implications

Implication	**Yes*/No**
Will further decisions be required by another committee/full authority?	Yes – Agreement to Make the SINDP at a subsequent Planning Committee if a referendum is successful.
Does the proposal raise any Resource implications?	Yes – The Examination cost £8,455.20. The Referendum cost is still to be confirmed. However the SDNPA will be able to claim £20,000 shortly to cover the cost of the Examination and Referendum. The cost of Neighbourhood Planning to the SDNPA is currently covered by the grants received from Ministry of Housing Communities and Local Government (MHCLG). However these grants are starting to be reduced as Neighbourhood Planning increasingly becomes part of the mainstream. Currently within the National Park the cost of producing a plan ranges from around £8,100 (including the Examination and referendum) to £50,000.

	Once a NDP is made, a Town or Parish Council is entitled to 25% of Community Infrastructure Levy (CIL) collected from development within the neighbourhood area, as opposed to the capped 15% share where there is no NDP. The Parish Council can choose how it wishes to spend these funds on a wide range of things which support the development of the area.
Has due regard been taken of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	Due regard has been taken of the South Downs National Park Authority's equality duty as contained within the Equalities Act 2010. Stedham with Iping Parish Council who have the responsibility for preparing the neighbourhood plan have also prepared a Consultation Statement demonstrating how they have consulted the local community and statutory consultees. The Examiner was satisfied that the consultation and publicity undertaken meets regulatory requirements.
Are there any Human Rights implications arising from the proposal?	None
Are there any Crime & Disorder implications arising from the proposal?	None
Are there any Health & Safety implications arising from the proposal?	None
Are there any Sustainability implications based on the 5 principles set out in the SDNPA Sustainability Strategy:	The qualifying body with responsibility for preparing the neighbourhood plan must demonstrate how its plan will contribute to the achievement of sustainable development. This is set out in the Basic Conditions Statement. The examiner who assessed the plan considered that it met the requirements if a number of modifications were made. Please note that the sustainability objectives used by qualifying bodies may not be the same as used by the SDNPA, but they will follow similar themes. **Strategic Environmental Assessment (SEA)** The SINDP was screened out as requiring a Strategic Environmental Assessment. **Habitats Regulations Assessment (HRA)** The SINDP was screened out as requiring a Habitats Regulations Assessment.

8. Risks Associated with the Proposed Decision

Risk	Likelihood	Impact	Mitigation
The Examiner has recommended modifications to ensure the SINDP meets the Basic Conditions. If these modifications are not implemented the SINDP would be at risk of legal challenge on the basis it does not meet the legal requirements for NDPs.	Low	Medium	The Examiner's recommended modifications are agreed in full.

TIM SLANEY
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Appendices	1. Stedham with Iping Neighbourhood Area Map 2. Examiners Report 3. Decision Statement
SDNPA Consultees	Legal Services; Chief Finance Officer; Monitoring Officer; Director of Planning
External Consultees	None
Background Documents	Stedham with Iping Neighbourhood Development Plan: Submission Version Stedham with Iping Neighbourhood Development Plan: Examiner's Report The SDNPA response to the Pre Submission consultation (Item 13): https://www.southdowns.gov.uk/meeting/planning-committee-10-may-2018/ The SDNPA response to the Submission consultation: https://www.southdowns.gov.uk/wp-content/uploads/2019/04/SDNPA-response-Submission.pdf

Stedham with Iping Neighbourhood Area

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STEDHAM WITH IPING NEIGHBOURHOOD PLAN 2018-2033

Stedham with Iping Neighbourhood Plan Examination,
A Report to South Downs National Park Authority

by Independent Examiner, Nigel McGurk BSc(Hons) MCD MBA MRTPI

October 2019

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Contents

1. Summary

1 Subject to the recommendations within this Report, made in respect of enabling the Stedham with Iping Neighbourhood Plan to meet the basic conditions, I confirm that:

- having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
- the making of the neighbourhood plan contributes to the achievement of sustainable development;
- the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
- the making of the neighbourhood plan does not breach, and is otherwise compatible with, European Union (EU) obligations; and
- the making of the neighbourhood plan is not likely to have a significant effect on a European site[1] or a European offshore marine site, either alone or in combination with other plans or projects.

2 Taking the above into account, I find that the Stedham with Iping Neighbourhood Plan meets the basic conditions[2] and I recommend to the South Downs National Park Authority that, subject to modifications, it should proceed to Referendum.

[1] See Paragraphs 38-41 of this Report.
[2] It is confirmed in Chapter 3 of this Report that the Stedham with Iping Neighbourhood Plan meets the requirements of Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990.

2. Introduction

The Neighbourhood Plan

3 This Report provides the findings of the examination into the Stedham with Iping Neighbourhood Plan (referred to as the Neighbourhood Plan) prepared by the Neighbourhood Plan Steering Group on behalf of Stedham with Iping Parish Council.

4 As above, the Report recommends that the Neighbourhood Plan should go forward to a Referendum. Were a Referendum to be held and were more than 50% of votes to be in favour of the Neighbourhood Plan, then the Plan would be formally *made* by the South Downs National Park Authority. The Neighbourhood Plan would then form part of the development plan and as such, it would be used to determine planning applications and guide planning decisions in the Stedham with Iping Neighbourhood Area.

5 Neighbourhood planning provides communities with the power to establish their own policies to shape future development in and around where they live and work.

"*Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need*."
(Paragraph 183, National Planning Policy Framework)

6 Stedham with Iping Parish Council is the *Qualifying Body,* ultimately responsible for the Neighbourhood Plan.

7 The Neighbourhood Plan relates only to the designated Stedham with Iping Neighbourhood Area and there is no other neighbourhood plan in place in the Stedham with Iping Neighbourhood Area.

8 The above meets with the aims and purposes of neighbourhood planning, as set out in the Localism Act (2011), the National Planning Policy Framework (2012[3]) and Planning Practice Guidance (2014).

[3] A replacement National Planning Policy Framework (the Framework) was published in July 2018. Paragraph 214 of the replacement document establishes that the policies of the previous Framework apply for the purpose of examining plans, where those plans are submitted on or before the 24th January 2018. The Stedham with Iping Neighbpourhood Plan was submitted in November 2019 and it is therefore appropriate to examine it against the 2012 Framework.

Role of the Independent Examiner

9 I was appointed by the South Downs National Park Authority, with the consent of the Qualifying Body, to conduct the examination of the Stedham with Iping Neighbourhood Plan and to provide this Report.

10 As an Independent Neighbourhood Plan Examiner, I am independent of the Qualifying Body and the Local Authority. I do not have any interest in any land that may be affected by the Neighbourhood Plan and I possess appropriate qualifications and experience.

11 I am a chartered town planner and have seven years' direct experience as an Independent Examiner of Neighbourhood Plans. I also have thirty years' land, planning and development experience, gained across the public, private, partnership and community sectors.

12 As the Independent Examiner, I must make one of the following recommendations:

- that the Neighbourhood Plan should proceed to Referendum, on the basis that it meets all legal requirements;
- that the Neighbourhood Plan, as modified, should proceed to Referendum;
- that the Neighbourhood Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.

13 If recommending that the Neighbourhood Plan should go forward to Referendum, I must then consider whether the Referendum Area should extend beyond the Stedham with Iping Neighbourhood Area to which the Plan relates.

14 Where modifications are recommended, they are presented as bullet points and highlighted in **bold print**, with any proposed new wording in *italics*.

Neighbourhood Plan Period

15 A neighbourhood plan must specify the period during which it is to have effect.

16 The front cover of the Neighbourhood Plan clearly sets out that the plan period comprises "2018-2033."

17 In addition to the above, both the Introductions to the Neighbourhood Plan and the Basic Conditions Statement submitted alongside the Neigbourhood Plan, refer to the plan period.

18 Taking the above into account, the Neighbourhood Plan specifies the plan period during which it is to have effect.

Public Hearing

19 According to the legislation, *when the Examiner considers it necessary* to ensure adequate examination of an issue, or to ensure that a person has a fair chance to put a case, then a public hearing must be held.

20 However, the legislation establishes that it is a general rule that neighbourhood plan examinations should be held without a public hearing – by written representations only.

21 Further to consideration of the information submitted, I determined not hold a public hearing as part of the examination of the Stedham with Iping Neighbourhood Plan.

22 However, in order to clarify a number of points in respect of the examination, I wrote to the Qualifying Body and to South Downs National Park Authority and this examination has taken the responses received into account.

3. Basic Conditions and Development Plan Status

Basic Conditions

23 It is the role of the Independent Examiner to consider whether a neighbourhood plan meets the "basic conditions." These were *set out in law*[4] following the Localism Act 2011. Effectively, the basic conditions provide the rock or foundation upon which neighbourhood plans are created. A neighbourhood plan meets the basic conditions if:

- having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
- the making of the neighbourhood plan contributes to the achievement of sustainable development;
- the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
- the making of the neighbourhood plan does not breach, and is otherwise compatible with, European Union (EU) obligations; and
- prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.

24 Regulations 23 and 33 of the Neighbourhood Planning (General) Regulations 2012 (as amended) set out two additional basic conditions to those set out in primary legislation and referred to above. Of these, the following basic condition, brought into effect on 28th December 2018, applies to neighbourhood plans:

- the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations.[5]

[4] Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended).
[5] Ibid (same as above).

25 In examining the Plan, I am also required, as set out in sections 38A and 38B of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act), to check whether the neighbourhood plan:

- has been prepared and submitted for examination by a qualifying body;
- has been prepared for an area that has been properly designated for such plan preparation (under Section 61G of the Localism Act);
- meets the requirements to i) specify the period to which it has effect; ii) not include provision about excluded development; and iii)not relate to more than one neighbourhood area and that:
- its policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004.

26 An independent examiner must also consider whether a neighbourhood plan is compatible with the Convention rights.[6]

27 I note that, in line with legislative requirements, a Basic Conditions Statement was submitted alongside the Neighbourhood Plan. This sets out how, in the qualifying body's opinion, the Neighbourhood Plan meets the basic conditions.

[6] The Convention rights has the same meaning as in the Human Rights Act 1998.

European Convention on Human Rights (ECHR) Obligations

28 I am satisfied that the Neighbourhood Plan has regard to fundamental rights and freedoms guaranteed under the ECHR and complies with the Human Rights Act 1998 and there is no substantive evidence to the contrary.

29 In the above regard, I also note that Information has been submitted to demonstrate that people were provided with a range of opportunities to engage with plan-making in different places and at different times. Many comments were received during the plan-making process and the Consultation Statement submitted alongside the Neighbourhood Plan provides a summary of responses and resulting changes.

European Union (EU) Obligations

30 In some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a Strategic Environmental Assessment (SEA). In this regard, national advice states:

"*Draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects.*" (Planning Practice Guidance[7])

31 This process is often referred to as a "*screening*" assessment[8]. If likely environmental effects are identified, an environmental report must be prepared.

32 A Strategic Environmental Assessment (SEA) screening report was prepared by South Downs National Park Authority. The screening report was submitted alongside the Neighbourhood Plan. It concluded that the Neighbourhood Plan:

"*…is unlikely to have significant effects and therefore does not require SEA*."

[7] Paragraph 027, Ref: 11-027-20150209, Planning Practice Guidance.
[8] The requirements for a screening assessment are set out in in Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004.

33 The statutory bodies, Historic England, Natural England and the Environment Agency, have been consulted. None of these bodies has raised any concerns in respect of the Neighbourhood Plan meeting European obligations.

34 In addition to SEA, a Habitats Regulations assessment identifies whether a plan is likely to have a significant effect on a European site, either alone or in combination with other plans and projects. This assessment must determine whether significant effects on a European site can be ruled out on the basis of objective information[9]. If it is concluded that there is likely to be a significant effect on a European site, then an appropriate assessment of the implications of the plan for the site must be undertaken.

35 A Habitats Regulations Assessment screening report was undertaken for the Neighbourhood Plan by South Downs National Park Authority. This concluded that:

"*…there are not considered to be likely significant effects on Singleton and Cocking SAC or the Ebernoe Common Special Area of Conservation arising from the Stedham with Iping Neighbourhood Development Plan. Therefore the Stedham with Iping NDP does not require progression to the next stage of Habitats Regulations Assessment*."

36 Again, the statutory bodies were consulted and none dissented from the above conclusion nor raised any issues in respect of European obligations.

37 Further to the above, national guidance establishes that the ultimate responsibility for determining whether a draft neighbourhood plan meets EU obligations lies with the local planning authority:

"*It is the responsibility of the local planning authority to ensure that all the regulations appropriate to the nature and scope of a neighbourhood plan proposal submitted to it have been met in order for the proposal to progress. The local planning authority must decide whether the draft neighbourhood plan is compatible with EU regulations (including obligations under the Strategic Environmental Assessment Directive)*" (Planning Practice Guidance[10]).

38 In carrying out the work that it has and in reaching the conclusions that it has, South Downs National Park Authority has not raised any concerns in respect of the Neighbourhood Plan's compatibility with EU obligations.

[9] Planning Practice Guidance Paragraph 047 Reference ID: 11-047-20150209.
[10] ibid, Paragraph 031 Reference ID: 11-031-20150209.

39 Further to the all of the above, in April 2018, in the case People Over Wind & Sweetman v Coillte Teoranta ("*People over Wind*"), the Court of Justice of the European Union clarified that it is not appropriate to take account of mitigation measures when screening plans and projects for their effects on European protected habitats under the Habitats Directive. In practice this means if a likely significant effect is identified at the screening stage of a habitats assessment, an *Appropriate Assessment* of those effects must be undertaken.

40 In response to this judgement, the government made consequential changes to relevant regulations through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

41 The changes to regulations allow neighbourhood plans and development orders in areas where there could be likely significant effects on a European protected site to be subject to an Appropriate Assessment to demonstrate how impacts will be mitigated, in the same way as would happen for a draft Local Plan or planning application. These changes came into force on 28th December 2018.

42 I note that South Downs National Park Authority has had the opportunity to consider the impacts of the Sweetman judgement and that it is satisfied that the Neighbourhood Plan is compatible with European obligations.

43 Taking all of the above into account, I am satisfied that the Neighbourhood Plan is compatible with European obligations.

4. Background Documents and the Stedham with Iping Neighbourhood Area

Background Documents

44 In undertaking this examination, I have considered various information in addition to the Stedham with Iping Neighbourhood Plan and draw attention to the fact that a replacement version of the National Planning Policy Framework was published in July 2018 and revised in 2019. The previous National Planning Policy Framework was published in 2012 and the replacement version differs from it in a number of ways.

45 However, as noted above, Paragraph 214 of the replacement document establishes that the policies of the previous National Planning Policy Framework (2012) apply for the purpose of examining plans submitted prior to the 25th January 2019. The Stedham with Iping Neighbourhood Plan was submitted prior to this date and in line with national policy requirements, has been examined against the previous National Planning Policy Framework.

46 I note that the South Downs National Park Local Plan was adopted during the examination stage.

47 Taking the above into account, information considered as part of this examination has included (but is not limited to) the following main documents and information:

- National Planning Policy Framework (referred to in this Report as "*the Framework*") (2012)
- Planning Practice Guidance (2014)
- Town and Country Planning Act 1990 (as amended)
- The Localism Act (2011)
- The Neighbourhood Plan Regulations (2012) (as amended)
- The South Downs National Park Local Plan (2019)
- Basic Conditions Statement
- Consultation Statement
- Sustainability Appraisal (Incorporating Strategic Environmental Assessment)

Also:

- Representations received

48 In addition, I spent an unaccompanied day visiting the Stedham with Iping Neighbourhood Area.

Stedham with Iping Neighbourhood Area

49 The boundary of the Stedham with Iping Neighbourhood Area is shown on Figure 1, on page 4 of the Neighbourhood Plan. It covers the same area as that of the Parish of Stedham with Iping.

50 South Downs National Park Authority formally designated the Stedham with Iping Neighbourhood Area on 1st August 2017.

51 This satisfies a requirement in line with the purposes of preparing a Neighbourhood Development Plan under section 61G (1) of the Town and Country Planning Act 1990 (as amended).

5. Public Consultation

Introduction

52 As land use plans, the policies of neighbourhood plans form part of the basis for planning and development control decisions. Legislation requires the production of neighbourhood plans to be supported by public consultation.

53 Successful public consultation enables a neighbourhood plan to reflect the needs, views and priorities of the local community. It can create a sense of public ownership, help achieve consensus and provide the foundations for a 'Yes' vote at Referendum.

Stedham with Iping Neighbourhood Plan Consultation

54 A Consultation Statement was submitted to South Downs National Park Authority alongside the Neighbourhood Plan. The information within it sets out who was consulted and how, together with the outcome of the consultation, as required by the neighbourhood planning *regulations*[11].

55 Taking the information provided into account, there is evidence to demonstrate that the Neighbourhood Plan comprises a "*shared vision*" for the Stedham with Iping Neighbourhood Area, having regard to Paragraph 183 of the National Planning Policy Framework ("*the Framework*").

56 Stedham with Iping Parish Council established a Steering Group to prepare the Neighbourhood Plan. A Parish-wide questionnaire, supported by three drop-in sessions, was carried out during July/August 2017. Surveys were returned by over 300 residents, the results of which were presented at a public meeting in September 2017.

57 The information gathered informed the vision and objectives of the emerging plan and a Call for Sites exercise was carried out during the second half of 2017. A total of 42 responses were received and these were duly recorded, considered and helped to inform the submission version of the Neighbourhood Plan.

[11] Neighbourhood Planning (General) Regulations 2012.

58 The Consultation Report provides evidence to demonstrate that public consultation formed an important part of the overall plan-making process. It was well-publicised on a consistent basis. Information was provided on the Parish website and use was made of noticeboards, public display boards and posters. Matters raised were considered in detail and that the reporting process was transparent.

59 Taking all of the above into account, I am satisfied that the consultation process complied with the neighbourhood planning regulations referred to above.

6. The Neighbourhood Plan – Introductory Section

60 For clarity and precision, I recommend:

- **Page 3, penultimate paragraph, first line, add the following "…a *made (or adopted) neighbourhood plan's policies have the same legal status as those of* the Local Plan prepared…and *is* used in the determination of planning applications."**

- **Page 4, sentence before bullet points, delete "The basic conditions that must be met are:" and replace with "*These include:"*** (The list of bullet points relates to matters in addition to the basic conditions)

61 The last three paragraphs on page 5 are unnecessary. The first of these has been overtaken by events (and is incorrect) and the last two paragraphs appear subjective. I recommend:

- **Page 5, delete last three paras ("The SINDP needs…and complied with.")**

62 The use of "SINDP OB1, SINDP OB2" etc before each of the Objectives set out on pages 6 and 7 appears confusing. The objectives have no planning policy status, but simply clarify the Neighbourhood Plan's aims. Giving each of them a distinct number is unnecessary and runs the risk of confusing the objectives with the Policies, which do need to be numbered. The approach detracts from the clarity of the Neighbourhood Plan.

63 I recommend:

- **Delete all of the Objective numbers and replace with bullet points**

7. The Neighbourhood Plan – Neighbourhood Plan Policies

General Development Policies

Policy SINDP1 - Stedham Settlement boundary

64 Local Plan Strategic Policy SD25 ("*Development Strategy*") defines the settlement of Stedham. Within the settlement, the principle of development is supported, subject to it making efficient and appropriate use of land; making best use of brownfield land:

"…*and being of a scale and nature appropriate to the character and function of the settlement in its landscape context*."

65 In this way, the Local Plan pursues sustainable development in a positive way, in line with the national policy:

"…*presumption in favour of sustainable development*."
(Paragraph 14, NPPF)

66 To a large degree, Stedham's settlement boundary, referred to in Policy SINDP1 and shown on the Map accompanying the Neighbourhood Plan, mirrors that of the Local Plan. However, it fails to fully reflect the boundary of the mixed use development site at Stedham Sawmill, allocated in the Local Plan.

67 As a consequence of this, the Neighbourhood Plan is not in general conformity with the Local Plan and places a potential obstacle in the way of an adopted, allocated site, which may prevent it from coming forward. Whilst I note that the intention of the approach is to provide a buffer in respect of a nearby SSSI, there is no substantive evidence to demonstrate that this is necessary, or for example, that the adopted boundary in the Local Plan fails to contribute to the achievement of sustainable development.

68 As noted earlier, the Local Plan has been adopted recently. It has been subject to rigorous examination. There is nothing before me to fully justify Policy SINDP1's different approach to that of Local Plan Policy SD25 and my recommendation below takes this into account. In this regard, I note that, further to consideration of this matter, the Qualifying Body is content that:

"…*the settlement boundary in the SINDP can mirror the one in the SDLP*.[12]"

69 Taking the above into account, I recommend:

- **Policy SINDP1, change the Policy text to "*The settlement boundary shown on the SINDP Map will apply to all Policies that refer to a 'Settlement Boundary.'***
- **Change the settlement boundary shown on the SINDP Map to the adopted settlement boundary shown in the Local Plan. For the avoidance of doubt, the settlement boundary shown on the SINDP Map should be the same as that adopted in the Local Plan**
- **Delete the two paras of supporting text above Policy SINDP1**

[12] SIPC Response to Examiner's Request for Clarification (19/09/19).

Policy SINDP2 – Preserving our rural character

70 Local Plan Strategic Policy SD4 ("*Landscape Character*") establishes requirements to ensure that development proposals conserve and enhance landscape character in the National Park.

71 To achieve this, Policy SD4 requires development to:

"*…safeguard the experiential and amenity qualities of the landscape; and where planting is considered appropriate, (demonstrate) it is consistent with local character, enhances biodiversity, contributes to the delivery of GI and uses native species...*"

72 To some significant degree, Policy SINDP2, which seeks to ensure that development preserves local character, is in general conformity with the Local Plan. However, as set out, the Policy requires development not to be visible, in any way, from the A272, without any supporting evidence to demonstrate that such an approach would be deliverable.

73 As such, the Policy does not have regard to Paragraph 173 of the Framework, which states that:

"*Plans should be deliverable."*

74 Further to the above, the Neighbourhood Plan recognises that part of Neighbourhood Area's character is derived from "*numerous isolated buildings scattered amongst fields*" and that built form is "*generally*" rather than completely hidden from views from major roads. There is no evidence to demonstrate that development that might be glimpsed from the A272 would necessarily result in harm or fail to contribute to the achievement of sustainable development.

75 Much of the Policy goes on to comprise a "*statement*" rather than a land use planning policy requirement. The Policy states that screening "*can be achieved by*…" The Policy also includes the vague and ambiguous reference, "*where suitable,*" without clarity as to when and where something might be suitable, or who would determine this. Similarly, the Policy goes on to refer to "*suitable*" assessments, without establishing what these might comprise.

76 In the above regard, Policy SINDP2 does not have regard to national guidance[13], which states that:

"A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared."

77 The final sentence of the Policy is highly prescriptive, yet would fail to achieve part of the Policy's aim for a number of years following development and could preclude the planting of local species, contrary to Local Plan Strategic Policy SD4, referred to above.

78 I recommend:

- **Policy SINDP2, change wording of Policy to "*The A272 corridor, as shown on the SINDP Map, is particularly sensitive to change and any development within it must conserve and enhance landscape character. Development within the A272 corridor will be expected to maintain Stedham's largely hidden character through the use of planting with native species.*" (delete rest of Policy)**

- **First para in second column on page 10, line three, change to "…of the Parish *and their protection is provided for in adopted planning* policy and so has not been specifically included here."**

[13] Planning Policy Guidance, Paragraph: 041 Reference ID: 41-042-20140306.

Community

Policy SINDP3 – Recreational and Community Facilities

79 Chapter 3 of the Framework, "*Supporting a prosperous rural economy*," sets out a requirement for neighbourhood plans to:

"*…promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship*."
(Paragraph 28, the Framework)

80 In part, Policy SINDP3 provides for the protection of community facilities and subject to the considerations below, has regard to national policy.

81 However, the first part of Policy SINDP3 is confusingly worded, such that, rather than promote the development of local services and community facilities, having regard to the Framework, the Policy appears to place a significant barrier in the way of sustainable development.

82 As set out, the Policy requires any development relating to a community facility to be justified by a demonstration of need and/or a demonstration of benefits to the local community. National policy does not seek to subject the provision of local services and community facilities to such a test and there is no evidence to demonstrate that failing to have regard to this will result in the Neighbourhood Plan contributing to the achievement of sustainable development.

83 In seeking to address the above, the Qualifying Body has suggested that the Policy wording be changed to include a requirement to demonstrate improvements "*the quality and effectiveness*." However, this potentially replaces one unnecessary barrier to sustainable development with another one. Further, in the absence of any measures relating to how quality and effectiveness would be judged, on what basis and who by, such an approach would add a layer of ambiguity to the Policy and detract from its clarity, contrary to national guidance referred to earlier.

84 The second part of Policy SINDP3 refers to "*significant harm to the value*" of a facility. There is no baseline indication of what the existing value of community facilities comprises and consequently, it is difficult to understand how harm to value might be interpreted. Similarly, there is no information in respect of what might be "*significant,*" or how this might be judged and consequently, this part of the Policy fails to provide a decision maker with a clear indication of how to react to a development proposal, having regard to Paragraph 154 of the Framework.

85 Further, it is not clear why the loss of, or harm to, many of the facilities listed (eg, the recreation ground, playing field, allotments, Commons, sports field, primary school, churches) would be supported should the facility be shown to be "*unviable*" and further to a marketing exercise. Many of the facilities listed are greatly valued for reasons other than their "*viability*" and there is no evidence to demonstrate that such an approach would be relevant or appropriate, having regard to national policy support for the protection of valued facilities, as set out in Chapter 8 of the Framework, "*Promoting healthy communities*."

86 The Policy includes a reference to Assets of Community Value. Further to request, the Qualifying Body has been unable to point me to any registered Assets of Community Value in the Neighbourhood Area. Heritage assets were referred to, but these are not the same thing as Assets of Community Value. The recommendation below in this regard takes account of the fact that, by definition, registered Assets of Community Value are protected.

87 I recommend:

- **Change the first paragraph of Policy SINDP3 to "*The retention and improvement of community facilities will be supported.*"**
- **Delete second para of Policy (Development…current use.")**
- **Delete bullet point 10) ("Any building/land registered as an Asset of Community Value")**

Policy SNDP4 – Local Green Space

88 Local communities can identify areas of green space of particular importance to them for special protection. Paragraph 76 of the Framework states that:

"*Local communities…should be able to identify for special protection green areas of particular importance to them*. *By designating land as local Green Space local communities will be able to rule out new development other than in very special circumstances*."

89 The Framework requires policies for managing development within a Local Green Space to be consistent with those for Green Belts (Paragraph 78, the Framework). A Local Green Space designation therefore provides protection that is comparable to that for Green Belt land. Consequently, Local Green Space comprises a restrictive and significant policy designation.

90 The designation of land for Local Green Space must meet the tests set out in Paragraph 77 of the Framework. These are that the green space is in reasonably close proximity to the community it serves; that it 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 that it is local in character and is not an extensive tract of land.

91 In addition to the above, Paragraph 76 of the Framework requires that the designation of 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.

92 Policy SINDP4 seeks to designate five areas of Local Green Space. Of these, each of the areas, other than Rectory Field, is supported by information clearly demonstrating why the area of Local Green Space is demonstrably special to local people and why it holds a particular local significance.

93 In contrast, the supporting information for Rectory Field is very limited and relies on a vague reference to the site providing open and uphill views; and providing a green boundary to the village. Similar qualities could be said to apply to numerous fields and areas around Stedham. In this regard, national policy is clear:

"*The Local Green Space designation will not be appropriate for most green areas or open space*."

94 In support of the designation of Rectory Field, the only additional evidence to the very brief information contained in the "*Review of Open Spaces and Views*" supporting paper, is a description of the site contained in the evidence base paper, "*Landscape Review of Sites*." This only comprises a very short, two paragraphs-long landscape character analysis that concludes that the site is not appropriate for development. It does not seek to set out why the site is demonstrably special and holds a particular local significance within the context of Local Green Space designation.

95 Given the above, I am unable to conclude that the proposed Rectory Field designation meets the required policy tests.

96 Local Green Space is a very important designation. It is essential that an area designated as such is clearly defined, so that there can be no doubt as to the area to which the designation applies. This is a matter addressed below.

97 Whilst a representation has been received in respect of the designation of the Allotments site, I am satisfied, taking into account the evidence provided, that the designation of the site in the Neighbourhood Plan meets the basic conditions.

98 I recommend:

- **Policy SINDP4, delete "(v) Rectory Field"**

- **Provide clear plans, on an Ordnance Survey Base or similar, showing the precise boundaries of each Local Green Space. These plans should follow the Policy and be contained within, rather than be separate from, or appended to, the Neighbourhood Plan**

Policy SINDP5 – Local Community Space

99 Policy SINDP5 seeks to designated land as "*Local Community Space*" where development would effectively be ruled out, unless it "*improved*" the existing use and community value of the space. Essential infrastructure would be ruled out, unless it was "*small-scale*."

100 In the absence of any information, it is not clear how the requirements of Policy SINDP5 would contribute to the achievement of sustainability; and there is no evidence that the approach set out has regard to national policy, or is in general conformity with the strategic policies of the Local Plan. I am unable to conclude that Policy SINDP5 meets the basic conditions.

101 On consideration, the Qualifying Body has concluded that "*Policy SINDP5 should be removed*."

102 I recommend:

- **Delete Policy SINDP5**
- **Delete the paragraph of supporting text and its heading above the Policy on Page 15**

Policy SINDP6 – Promoting Health and Wellbeing

103 Policy SINDP6 sets out a requirement for all developments of five dwellings or more to provide public facilities for exercise and states that such provision will be "*matched*" by similar equipment provided on areas of Local Green Space.

104 The Policy is not supported by any evidence in respect of the deliverability or viability of such a requirement, having regard to Paragraph 173 of the Framework, which states that:

"*Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable."*

105 Further, there is no evidence to demonstrate that "*matching*" development would be appropriate for areas of Local Green Space.

106 In general terms, much of the content of Policy SINDP6 is reflective of a local aspiration and as such, it is perhaps more suited as background information, rather than a land use planning policy. The Qualifying Body, on consideration, support the removal of Policy SINDP6 from the Neighbourhood Plan, subject to the inclusion of the aspiration contained therein within the supporting text.

107 I recommend:

- **Delete Policy SINDP6**

- **Change the paragraph of supporting text on page 16 to "*The Parish Council are supportive of measures to provide new play equipment alongside existing play equipment, in a manner which is in keeping with local character. In addition, the Parish Council will work to encourage development to provide and/or support facilities which enable people to lead an active life – including for example, the provision of cycle parking or the provision of dedicated exercise equipment.***

  ***The Parish Council will seek to encourage the creation of a Fitness Trail and the provision of outdoor table tennis, gym and exercise equipment, albeit in a manner that is not visually intrusive*."**

Allocations for New Development

Policy SINDP7 – Stedham Sawmills

108 The South Downs Local Plan was adopted on 2nd July 2019. Local Plan Allocation Policy SD88 allocates Stedham Sawmills as a mixed use site for the development of up to 16 dwellings and 1500 square metres; and approximately 0.35 ha of land for biodiversity protection and enhancements.

109 Policy SD88 goes on to set out a number of detailed, site-specific development requirements.

110 Policy SINDP7 has, to some significant degree, been overtaken by events. Contrary to the Policy and its supporting text, the Neighbourhood Plan does not allocate Stedham Sawmills. The Local Plan allocates the site.

111 Whilst parts of Policy SINDP7 comprise the unnecessary repetition of parts of Policy SD88, the Neighbourhood Plan Policy also includes requirements that conflict directly with the Local Plan and that appear ambiguous.

112 There is no requirement for the adopted allocation to provide live-work units and no detailed justification, for example in the form of viability and deliverability evidence, to support the requirements of Policy SINDP7 in this regard. The supporting text to Policy SD88 recognises that live-work units may be suitable, but recognition of possible suitability is not the same as a policy requirement.

113 Similarly, the Policy seeks to introduce access requirements that go beyond the requirements set out in Policy SD88, without supporting evidence in respect of viability and deliverability. Consequently, it is not possible to conclude that the requirements set out in Policy SINDP7 contribute to the achievement of sustainable development.

114 It is not clear, in the absence of any detailed information, what an *"acceptable*" level of daylight and sunlight comprises, and who will judge this and on what basis.

115 A proposed requirement for all dwellings to provide for a visitor parking space in a shared off-road car park conflicts with Policy SD88 and is not supported by evidence or justification in respect of viability or deliverability.

116 There is no indication of what a "*proportion*" of elderly housing might amount to and no substantive evidence to demonstrate that it is viable and deliverable to require the provision of market housing appropriate for the needs of the elderly.

117 Notwithstanding all of the above, much of Policy SINDP7 relates to requirements associated with a local connections scheme at Stedham Sawmill to be led by a Community Land Trust. There is no evidence of any agreement between the landowner and a Community Land Trust in this regard and therefore, there is no certainty that a local connections scheme can be led in the manner anticipated by Policy SINDP7.

118 Local Plan Strategic Policy SD28 seeks to maximise the delivery of affordable homes. In so doing, it states that:

"*Occupancy conditions and local connection criteria will be applied to affordable housing to ensure local needs are met. Specific criteria will be determined by the Authority, in close partnership with established and legally constituted organisations or CLTs where applicable*."

119 This approach allows for local connections to be assessed in a cascade manner, having primary regard to the relevant housing register allocations policy. This provides for flexibility. It allows for a Community Land Trust to be the managing body for affordable homes, as appropriate.

120 However, the approach set out in Policy SINDP7 fails to provide for such flexibility. Rather, it seeks to apply a stringent local connections policy to be led by a body, regardless of whether or not there is an appropriate agreement for it to do so. Such an approach could place a significant barrier in the way of the achievement of sustainable development and does not meet the basic conditions.

121 Taking all of the above into account, I recommend:

- **Change the wording of Policy SD7 to "*The development of Stedham Sawmills must demonstrate sensitive and high quality design that respects local character and makes a positive contribution to its surroundings and deliver affordable housing to meet local needs in accordance with development plan requirements*."**

- **Delete the supporting text on page 17 and at the top of page 18**

- **Replace the supporting text with "*The Stedham Sawmills site is allocated in the South Downs Local Plan (Allocations Policy SD88) for up to 16 dwellings and 1500 square metres of work space; and approximately 0.35 ha of land for biodiversity protection and enhancements.***

  The sensitive delivery of this allocation is supported by the Neighbourhood Plan.

  ***The Parish Council is keen to see the affordable housing provision delivered by a Community Land Trust and will seek to negotiate with the landowner on this basis. It is essential that affordable homes meet local needs and the Parish Council will work with partners with the aim of ensuring that a local connections policy is best-suited to local needs*.**

  The Parish Council will also seek to encourage the developer to provide a proportion of the market housing in a manner that is suitable for occupation by elderly people.

  ***The Parish Council would like to see the provision of live-work units at the site; would like to prevent the development of any new vehicular access from the site to School Lane; and would like to see a shared off-road car park provide for visitor spaces. These are matters that the Parish Council will seek to encourage*."**

Policy SINDP8 – Unallocated residential development

122 Policy SINDP8 seeks to provide for small-scale windfall residential development and in general terms, has regard to Paragraph 47 of the Framework, which seeks to:

"…*boost significantly the supply of housing*…"

123 It is not necessary for the Neighbourhood Plan to set out what it does not do, or for it to refer to other policies in the development plan. The policies of the development plan must be considered as a whole, thus removing the need for cumbersome cross-references.

124 It is not clear how the acceptability or otherwise of impacts on amenity might be measured and this part of the Policy appears ambiguous.

125 The phrase "*will only be permitted*" runs the risk of pre-determining the planning application process, without allowing for the balanced consideration of benefits and harm. This is a matter addressed in the recommendations below.

126 The Policy seeks to limit any residential development outside the settlement boundary to brownfield land adjacent to existing properties. Such an approach fails to have regard to national policy, which does not place such an onerous restriction on the provision of new homes in the countryside.

127 Significant views from open spaces or rights of way are not defined and it is therefore unclear how development might cause "*diminution or loss*" to such.

128 I recommend:

- **Policy SINDP8, change wording to "*All residential development must respect local character and residential amenity; and should not be located on 'back-land' (as defined in the Glossary). Small scale residential development of up to 3 dwellings within the settlement boundary will be supported. Residential development outside the settlement boundary, other than that appropriate to the countryside, will not be supported*."**

- **Delete the unnecessary first line of text ("Whilst we…allocated sites") and begin sentence "*We* are keen…"**

Local Economy and Businesss

Policy SINDP9 – A Strong Local Economy

129 In order to support economic growth in rural areas, Paragraph 28 of the Framework requires neighbourhood plans to:

"…*support the sustainable growth and expansion of all types of business*…"

130 Policy SINDP9 seeks to have regard to this by establishing support for development at "*Key Employment Sites"* across the Neighbourhood Area; and resists the loss of such sites.

131 As set out, the Policy fails to recognise the allocated status of land at Stedham Sawmills and appears to muddle "*key employment sites*" with the provision of important local facilities and services. The Policy also refers to supporting employers, which is not a land use planning matter and without substantive evidence, it is not clear why the phrase "*business viability*," suggested as a replacement term by the Qualifying Body, is appropriate to land use planning, or how it might be assessed).

132 Taking the above into account, I recommend:

- **Policy SINDP9, delete bold heading "Key Employment Sites"**
- **Change text of Policy to "*The development of local services and community facilities at Rotherhill Nursery, Stedham School, Hamilton Arms and Trotton Gate Garage will be supported*."**

Policy SINDP10 – The Small Business Economy

133 To some degree, Policy SINDP10 has regard to the Framework's support for the sustainable growth and expansion of rural businesses, as referred to earlier in this Report.

134 However, as set out, Policy SINDP10 seeks to prevent any business development on anything other than brownfield land and to prevent any business that operates on a 24 hour basis, or any business that requires lighting. No substantive evidence is provided in support of such requirements, which do not have regard to the Framework.

135 National policy explicitly requires neighbourhood plans to:

"…*promote the development and diversification of agricultural and other land-based rural businesses."*

136 As set out, Policy SINDP10 has some regard to this, although no clarity or evidence is provided in respect of the deliverability of mixed use live-work schemes incorporating '*social*' housing.

137 I recommend:

- **Policy SINDP10, change wording to "*The growth and expansion of small businesses and enterprises, both through conversion of existing buildings and well-designed new buildings; and the development and diversification of agricultural and other land-based rural businesses, will be supported subject to development respecting local character, residential amenity and highway safety.*"**

Policy SINDP11 – Communications infrastructure

138 Chapter 5 of the Framework, "*Supporting high quality communications infrastructure*," recognises the vital role that high quality communications infrastructure plays in respect of sustainable economic growth and enhancement of the provision of community facilities and services.

139 Policy SINDP11 is, to some extent, supportive of the provision of communications infrastructure and in this respect, it has regard to national policy.

140 However, as set out, the Policy seeks to limit communications infrastructure development to "*identified needs*" and to "*meet an unmet need*." Such an approach is in direct conflict with national policy, which requires plans to support the expansion of electronic communications networks. The proposed departure from national policy is unjustified.

141 It is not clear, in the absence of information, what "*utility infrastructure*" refers to.

142 National policy requires masts and sites for such infrastructure to be kept to a minimum consistent with the efficient operation of the network. Where new sites are required, national policy requires equipment to be sympathetically designed and camouflaged where appropriate.

143 Taking this and the above into account, I recommend:

- **Policy SINDP11, replace the wording of the Policy with "*The expansion of electronic communications networks, including telecommunications and high speed broadband, will be supported. Masts and sites for such installations should be kept to a minimum consistent with the efficient operation of the network and where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.*"**

The Natural Environment

Policy SINDP12 – Wildlife in the wider Parish

144 National policy, as set out in Chapter 11 of the Framework, "*Conserving and enhancing the natural environment*," requires the planning system to contribute to and enhance the natural and local environment by:

"…*minimising impacts on biodiversity and providing net gains in biodiversity where possible*…"
(Paragraph 109, the Framework)

145 Whilst Policy SINDP12 seeks to promote biodiversity, the Policy itself is ambiguously worded. For example, it is not clear how a decision maker should react to a development proposal on the basis of the statement (as opposed to land use planning policy requirement) that:

"*Areas where wildflowers and natural wildlife can thrive will be promoted*."

146 Further, no information is required in respect of how all developments will be encouraged to provide areas to enhance biodiversity, or why such a requirement would be necessary, related to development and fairly and reasonably related in scale and kind to development, in all circumstances, having regard to the requirements of Paragraph 204 of the Framework.

147 The majority of planning applications in the Neighbourhood Area are likely to relate to small development proposals, for example, household extensions, shop signs or even ATM machines. There is no information to demonstrate that it would be appropriate, or even possible, for such proposals to be obliged to provide areas such as wildlife corridors, wildlife meadows or community orchards to enhance the biodiversity of the Parish.

148 I recommend:

- **Policy SINDP12, change to "*Development should minimise impacts on biodiversity and provide net gains in biodiversity where possible.*"**

Policy SINDP13 – Dark Skies

149 Dark skies are a hugely important asset to the South Downs National Park.

150 Local Plan Strategic Policy SD8 ("*Dark Night Skies*") seeks to conserve and enhance the intrinsic quality of dark night skies and establishes a land use planning policy hierarchy in order to achieve this.

151 The approach set out in Policy SINDP13 is less nuanced and more blunt than Policy SD8 and this results in a Policy that seeks to introduce requirements that go well beyond the capabilities of land use planning policy.

152 On consideration, the Qualifying Body is satisfied that Policy SD8 meets relevant community aspirations and that consequently, the deletion of Policy SINDP13 is supported.

153 However, given the importance of dark skies to local character (and to the environment, generally), I recommend below that the supporting text relating to dark skies be changed to include direct reference to Policy SD8.

154 I recommend:

- **Delete Policy SINDP13**

- **Supporting text, page 26, change wording of last two sentences to "*…and ambience and the Parish Council is keen to ensure that external lighting requiring planning permission be kept to an absolute minimum.***

  ***South Downs Local Plan Strategic Policy SD8 requires development to conserve and enhance the intrinsic quality of the area's dark night skies*.**"

Policy SINDP14 – Tranquility

155 Like dark night skies, tranquillity comprises a very important characteristic of the South Downs National Park.

156 Local Plan Strategic Policy SD7 ("*Relative Tranquility*") affords protection to the tranquillity of the South Downs.

157 SINDP11 seeks to ensure that development does not harm the relative tranquillity of the Neighbourhood Area and in this way, it is in general conformity with the Local Plan.

158 The Policy refers to "*the Parish*" and "*its immediate surroundings*." However, the Neighbourhood Plan cannot seek to impose land use planning policies for any land that falls outside the Neighbourhood Area and this is a factor addressed by the recommendation below.

159 I recommend:

- **Policy SINDP14, change second line of the Policy to "…of the *Neighbourhood Area* once construction is..."**

Policy SINDP15 – Landscape and Views

160 National policy requires development to:

"…*respond to local character and history, and reflect the identify of local surroundings*…"
(Paragraph 58, the Framework)

161 In addition, Chapter 11 of the Framework, "*Conserving and enhancing the natural environment*," recognises that National Parks have the highest status of protection in relation to landscape and scenic beauty.

162 The first part of Policy SINDP15, which seeks to protect natural beauty, has regard to the Framework and is in general conformity with Local Plan Strategic Policy SD6 ("*Protecting Views*").

163 The second part of Policy SINDP15 suggests that development that is harmful to the National Park's landscape or views will be permitted so long as mitigation measures reduce harm to an acceptable level. It is unclear, in the absence of detailed information, how such an approach might work in practice – for example what mitigation might be acceptable - and consequently, this part of the Policy does not provide a decision maker with a clear indication of how to react to a development proposal.

164 The Policy does not provide any clarity in respect of what a "*prominent built form*" comprises and why, in all circumstances, such a built form would necessarily be harmful. Further, essential infrastructure is, by definition, essential and it is not the purpose of the Neighbourhood Plan to place an obstacle in the way of its delivery.

165 I recommend:

- **Policy SINDP15, delete all text after the end of bullet point (viii) ("Where…demonstrated.")**

Local Heritage

Policy SINDP16 – Parish Heritage Assets

166 National policy, set out in Chapter 12 of the Framework, "*Conserving and enhancing the historic environment*," recognises heritage assets as an irreplaceable resource.

167 It goes on to state that heritage assets should be conserved:

"*…in a manner appropriate to their significance."*

168 In respect of the effect of a development proposal on the significance of a non-statutory heritage asset, national policy requires there to be a balanced judgement, having regard to the scale of any harm or loss and the significance of the heritage asset.

169 Whilst the protection and/or enhancement of a heritage asset is a desirable outcome, national policy does not require development to enhance non-statutory heritage assets and as above, it provides for the balanced consideration of harm and benefits.

170 The text within Policy SINDP16 introduces a different approach to non-statutory heritage assets to that set out in national policy. This departure from national policy is not supported or justified by any substantive evidence.

171 The supporting text to the Policy appears confusing. The Policy refers to 34 non-statutory heritage assets, whilst the supporting text refers to both 27 and 29 non-statutory heritage assets.

172 Historic England has recommended that the list of non-statutory heritage assets be taken out of the Policy, to allow for changes over the duration of the plan-period.

173 Taking all of the above into account, I recommend:

- **Policy SINDP16, delete the first paragraph of text ("Development proposals…SINDP MAP")**

- **Change second line of second para to "Parish Heritage Assets *(as per the list of Parish Heritage Assets appended to the Neighbourhood Plan) should describe the impact of the development on the significance of the heritage asset.*" (delete rest of para)**

- **Remove the list of Parish Heritage Assets and replace in an Appendix to the Neighbourhood Plan**

- **Supporting text, page 32, delete last three lines and replace with "*This has identified a number of buildings, groups of buildings or structures considered to be worthy of protection. These are listed in an Appendix to the Neighbourhood Plan*."**

Policy SINDP17 – Barn Conversions

174 National policy, as set out in the Framework, promotes sustainable development, supports the re-use of buildings and promotes the effective use of brownfield land.

175 Policy SINDP17 commences with an approach founded upon the refusal of development proposals. Such a negative approach runs the risk of failing to provide for the balanced consideration of a planning proposal and appears contrary to the national planning policy presumption in favour of sustainable development.

176 Notwithstanding this, the overall intention of the Policy is to ensure that development looks to preserve essential qualities of distinct, traditional buildings and this approach has regard to Paragraph 58 of the Framework, which requires development to respond to local character and history.

177 Barn conversions to residential use are commonplace and their appropriate development has, amongst other things, provided for the restoration and preservation of traditional barns. The reference to such a change of use as comprising a "*last resort*" is not reflective of national policy.

178 I recommend:

- **Policy SINDP17, change first sentence to "Development proposals *involving traditional barns should respect* the significance of the barn..."**

- **Supporting text, delete the penultimate sentence ("Unconverted…resort.") and change last sentence to "*When* a barn is…"**

Policy SINDP18 – Sunken Lanes and Retaining Walls

179 In general terms, Policy SINDP18 seeks to protect local character, having regard to Paragraph 58 of the Framework, referred to earlier in this Report.

180 As worded, it is not clear, in the absence of any evidence or information, how all development might preserve tracks and walls, or why it would, in all cases be relevant or necessary for development to do so. Further, use of the phrase "*will not be permitted*" fails to provide for the balanced consideration of a proposal through the planning process and suggests that the Neighbourhood Plan determines planning applications, when that role is the responsibility of the Local Planning Authority.

181 I recommend:

- **Policy SINDP18, change to "*The preservation of* the old sunken…Map*, will be supported…*distinctiveness of a sunken lane *will not be supported*"**

Getting Around

Policy SINDP19 – Permissive and Public Rights of Way

182 Public rights of way are, by definition, protected by law. It is not only unnecessary for the Neighbourhood Plan to state that development should not result in *unacceptable* harm to public rights of way, but such an approach would, in effect, suggest that some harm to public rights of way may be *acceptable,* and this is an approach that is unjustified.

183 Policy SINDP19 goes on to require all development to provide new pedestrian and cycle routes. No information is provided in respect of why all developments should do this, having regard to Paragraph 204 of the Framework referred to earlier in this Report, and there is nothing to demonstrate that such a requirement is either viable or deliverable, having regard to Paragraph 173 of the Framework, also referred to earlier in this Report.

184 Notwithstanding the above, Paragraph 75 of the Framework states that:

"Planning policies should protect and enhance public rights of way and access."

185 Taking this and the above into account, I recommend:

- **Policy SINDP19, change wording to "*The protection and enhancement of public rights of way, including the provision of new pedestrian and cycle routes, will be supported.*"**

Policy SINDP20 – Car Parking

186 Part of Policy SINDP20 seeks to ensure that development does not significantly increase on-road parking. Such a measure has regard to Chapter 4 of the Framework, "*Promoting sustainable transport*," which supports highway safety.

187 However, the Policy goes on to seek to establish its own parking standards without supporting evidence in respect of viability and deliverability and contrary to Paragraph 39 of the Framework which requires local parking standards to take a variety of factors into account.

188 The Policy then goes even further by seeking to prevent any development at all if the provision of off-road parking is diminished. Such an approach would, for example, seek to prevent a household extension where the size of a parking area was reduced, regardless of how many parking spaces the area provided. There is no substantive evidence to support such an approach.

189 The Policy states that "*planning permission will be granted.*" This runs the risk of pre-determining a planning a planning application and is in any case, beyond the scope of the Neighbourhood Plan, as the responsibility of determining a planning application lies with the local planning authority.

190 I recommend:

- **Policy SINDP20, delete second sentence ("Residential…per dwelling") and parts (2) and (3)**

- **Replace parts (2) and (3) with "*The provision of new parking spaces will be supported, subject to it being demonstrated that they respect local character, residential amenity and highway safety*."**

Policy SINDP21 – Maintaining and Improving Accessibility

191 In general terms, Policy SINDP21 seeks to promote accessibility, to the benefit of pedestrians and cyclists. This has regard to Paragraph 35 of the Framework, which supports giving:

"*…priority to pedestrian and cycle movements...*"

192 As set out, the Policy requires all residential and employment generating development to be located within 400 metres of a bus stop. Such an approach fails to have regard to the rural nature of the Neighbourhood Area and runs the risk of preventing the Neighbourhood Plan from contributing to the achievement of sustainable development. Further to consideration, the Qualifying Body supports the removal of this reference.

193 It is not clear, in the absence of any information, how all development affecting pedestrian or vehicular routes "*shall create shared space*" – or why it should, or why this would, in all cases, be viable or deliverable, or even an appropriate outcome.

194 I recommend:

- **Policy SINDP21, delete text and replace with "*The development of shared space environments, providing pedestrians with priority over motorised traffic, will be supported. Development that would reduce accessibility for pedestrians and/or cyclists will not be supported. The development of facilities for cyclists, including the development of safe cycling routes and the provision of secure bike parking/storage will be supported.*"**

8. The Neighbourhood Plan: Other Matters

195 The recommendations made in this Report will also have a subsequent impact on Contents, including Policy, paragraph and page numbering.

196 I recommend:

- **Update the Contents and where necessary, Policy, paragraph and page numbering, to take into account the recommendations contained in this Report**

9. Referendum

197 I recommend to South Downs National Park Authority that, subject to the recommended modifications, **the Stedham with Iping Neighbourhood Plan should proceed to a Referendum**.

Referendum Area

198 I am required to consider whether the Referendum Area should be extended beyond the Stedham with Iping Neighbourhood Area.

199 I consider the Neighbourhood Area to be appropriate and there is no substantive evidence to demonstrate that this is not the case.

200 Consequently, I recommend that the Plan should proceed to a Referendum based on the Stedham with Iping Neighbourhood Area approved by South Downs National Park Authority on the 1st August 2017.

Nigel McGurk, October 2019
Erimax – Land, Planning and Communities

ERIMAX
EST. 2011

Stedham with Iping Neighbourhood Development Plan Decision Statement: January 2020

1. Introduction

1.1 Under the Town and Country Planning Act 1990 (as amended), the South Downs National Park Authority has a statutory duty to assist communities in the preparation of neighbourhood development plans and orders and to take plans through a process of examination and referendum. The Localism Act 2011 (Part 6 chapter 3) sets out the Local Planning Authority's responsibilities under Neighbourhood Planning.

1.2 This statement confirms that the modifications proposed by the examiner's report have been accepted, the draft Stedham with Iping Neighbourhood Development Plan has been altered as a result of it; and that this plan may now proceed to referendum.

2. Background

2.1 The Stedham with Iping Neighbourhood Development Plan relates to the area that was designated by the South Downs National Park Authority as a neighbourhood area on 1 August 2017. This area corresponds with the Stedham with Iping Parish boundary that lies within the South Downs National Park Local Planning Authority Area.

2.2 Following the submission of the Stedham with Iping Neighbourhood Development Plan to the National Park Authority, the plan was publicised and representations were invited. The publicity period ended on Friday 1 February 2019.

2.3 Mr Nigel McGurk BSc(Hons) MCD MBA MRTPI was appointed by the South Downs National Park Authority with the consent of Stedham with Iping Parish Council, to undertake the examination of the Stedham with Iping Neighbourhood Development Plan and to prepare a report of the independent examination.

2.4 The examiner's report concludes that subject to making the modifications recommended by the examiner, the Plan meets the basic conditions set out in the legislation and should proceed to a Neighbourhood Planning referendum.

3. Decision

3.1 The Neighbourhood Planning (General) Regulations 2012 requires the local planning authority to outline what action to take in response to the recommendations of an examiner made in a report under paragraph 10 of Schedule 4A to the 1990 Act (as applied by Section 38A of the 2004 Act) in relation to a neighbourhood development plan.

3.2 Having considered each of the recommendations made by the examiner's report, and the reasons for them, South Downs National Park Authority in consultation with Stedham with Iping Parish Council has decided to accept the modifications to the draft plan. Table 1 below outlines the alterations made to the draft plan under paragraph 12(6) of Schedule 4B to the 1990 Act (as applied by Section 38A of 2004 Act) in response to each of the Examiner's recommendations. The reasons set out have in some cases been paraphrased from the Examiners report for conciseness. This statement should be read alongside the Examiner's Report.

3.3 If the Authority is satisfied that, subject to the modifications being made, the Neighbourhood Plan meets the legal requirements and basic conditions then it can proceed to referendum.

Table 1

Recommended Modification to the SINDP	Justification	Decision
Introductory Section		
Page 3, penultimate paragraph, first line, add the following "…a made (or adopted) neighbourhood plan's policies have the same legal status as those of the Local Plan prepared…and is used in the determination of planning applications." Page 4, sentence before bullet points, delete "The basic conditions that must be met are:" and replace with "These include:" Page 5, delete last three paras ("The SINDP needs…and complied with.") Pages 6 and 7, delete all of the Objective numbers and replace with bullet points	For clarity and precision For clarity and precision Removal of unnecessary paragraphs For clarity, to avoid confusion with the Policies	Accept modification
Policy SINDP1 - Stedham Settlement boundary		
Change the Policy text in SINDP1 to: "The settlement boundary shown on the SINDP Map will apply to all Policies that refer to a 'Settlement Boundary'." Change the settlement boundary shown on the SINDP Map to the adopted settlement boundary shown in the Local Plan. For the avoidance of doubt, the settlement boundary shown on the SINDP Map should be the same as that adopted in the Local Plan. Delete the two paras of supporting text above Policy SINDP1	To be in general conformity with the adopted development plan.	Accept modification
Policy SINDP2 – Preserving our rural character		
Change wording of Policy to:	Change of wording to clarify the intention of the policy.	Accept modification

Recommended Modification to the SINDP	Justification	Decision
"The A272 corridor, as shown on the SINDP Map, is particularly sensitive to change and any development within it must conserve and enhance landscape character. Development within the A272 corridor will be expected to maintain Stedham's largely hidden character through the use of planting with native species." And delete rest of Policy.		
The first paragraph in second column on page 10, line three, change wording to: "…of the Parish and their protection is provided for in adopted planning policy and so has not been specifically included here."	Change of wording to clarify the intention of the policy.	Accept modification
Policy SINDP3 – Recreational and Community Facilities		
Change the wording of the first paragraph of Policy SINDP3 to: "The retention and improvement of community facilities will be supported."	Change of wording for clarity of policy.	Accept modification
Delete second para of Policy (Development…current use.")	For clarity and precision.	Accept modification
Delete bullet point 10) "Any building/land registered as an Asset of Community Value".	Deletion of this part of the policy because Assets of Community Value are already protected.	Accept modification
Policy SINDP4 – Local Green Space		
Delete point "(v) Rectory Field"	Deletion of this draft designation as supporting information for this part of the policy was very limited and vague and did not seek to set out why the site was demonstrably special.	Accept modification
Provide clear plans, on an Ordnance Survey Base or similar, showing the precise boundaries of each Local Green Space. These plans should follow the Policy and be contained within, rather than be separate from, or appended to, the Neighbourhood Plan.	Local Green spaces are important designations and it is essential maps are clearly defined.	Accept modification

Recommended Modification to the SINDP	Justification	Decision
Policy SINDP5 – Local Community Space		
Delete Policy SINDP5	Policy is unclear on how Policy SINDP5 would contribute to achievement of sustainability, and there is a lack of evidence that the approach is in regard to national policy.	Accept modification
Delete the paragraph of supporting text and its heading above the Policy on Page 15	Policy is unclear on how Policy SINDP5 would contribute to achievement of sustainability, and there is a lack of evidence that the approach is in regard to national policy.	Accept modification
Policy SINDP6 – Promoting Health and Wellbeing		
Delete Policy SINDP6	Policy is not supported by evidence in respect of deliverability or viability. Policy is more aspirational not land use policy, and would be better recommended for background information.	Accept modification
Change the paragraph of supporting text on page 16 to "The Parish Council are supportive of measures to provide new play equipment alongside existing play equipment, in a manner which is in keeping with local character. In addition, the Parish Council will work to encourage development to provide and/or support facilities which enable people to lead an active life – including for example, the provision of cycle parking or the provision of dedicated exercise equipment. The Parish Council will seek to encourage the creation of a Fitness Trail and the provision of outdoor table tennis, gym and exercise equipment, albeit in a manner that is not visually intrusive."	Policy is not supported by evidence in respect of deliverability or viability. Policy is more aspirational not land use policy, and would be better recommended for background information.	Accept modification

Recommended Modification to the SINDP	Justification	Decision
Policy SINDP7 – Stedham Sawmills		
Change the wording of Policy SD7 to: "The development of Stedham Sawmills must demonstrate sensitive and high quality design that respects local character and makes a positive contribution to its surroundings and deliver affordable housing to meet local needs in accordance with development plan requirements."	To clarify this component and to have proper regard to the adopted development plan.	Accept modification
Delete the supporting text on page 17 and at the top of page 18	To be consistent in policy wording.	Accept modification
Replace the supporting text with "The Stedham Sawmills site is allocated in the South Downs Local Plan (Allocations Policy SD88) for up to 16 dwellings and 1500 square metres of work space; and approximately 0.35 ha of land for biodiversity protection and enhancements. The sensitive delivery of this allocation is supported by the Neighbourhood Plan. The Parish Council is keen to see the affordable housing provision delivered by a Community Land Trust and will seek to negotiate with the landowner on this basis. It is essential that affordable homes meet local needs and the Parish Council will work with partners with the aim of ensuring that a local connections policy is best-suited to local needs. The Parish Council will also seek to encourage the developer to provide a proportion of the market housing in a manner that is suitable for occupation by elderly people. The Parish Council would like to see the provision of live-work units at the site; would like to prevent the development of any new vehicular access from the site to School Lane; and would like to see a shared off-road car park provide for visitor spaces. These are matters that the Parish Council will seek to encourage."	To provide wording that will enable implementation of this policy and have proper regard to the adopted development plan.	Accept modification

Recommended Modification to the SINDP	Justification	Decision
Policy SINDP8 – Unallocated residential development		
Policy SINDP8, change wording to "All residential development must respect local character and residential amenity; and should not be located on 'back-land' (as defined in the Glossary). Small scale residential development of up to 3 dwellings within the settlement boundary will be supported. Residential development outside the settlement boundary, other than that appropriate to the countryside, will not be supported."	To provide wording that will enable implementation of this policy and be in conformity with national policy.	Accept modification
Delete the unnecessary first line of text: "Whilst we…allocated sites" ,and begin sentence; "We are keen…"	For clarity and precision.	Accept modification
Policy SINDP9 – A Strong Local Economy		
Policy SINDP9, delete bold heading "Key Employment Sites"	For clarity and precision.	Accept modification
Change text of Policy to "The development of local services and community facilities at Rotherhill Nursery, Stedham School, Hamilton Arms and Trotton Gate Garage will be supported."	For clarity and precision.	Accept modification
Policy SINDP10 – The Small Business Economy		
Change policy wording to: "The growth and expansion of small businesses and enterprises, both through conversion of existing buildings and well-designed new buildings; and the development and diversification of agricultural and other land based rural businesses, will be supported subject to development respecting local character, residential amenity and highway safety."	To provide clarity on the wording used and rephrasing to delete any ambiguity.	Accept modification

Recommended Modification to the SINDP	Justification	Decision
Policy SINDP11 – Communications infrastructure		
Replace the wording of the Policy with: "The expansion of electronic communications networks, including telecommunications and high speed broadband, will be supported. Masts and sites for such installations should be kept to a minimum consistent with the efficient operation of the network and where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate."	To provide clarity on the wording used and rephrasing to delete any ambiguity.	Accept modification
Policy SINDP12 – Wildlife in the wider Parish		
Change wording to: "Development should minimise impacts on biodiversity and provide net gains in biodiversity where possible."	To clarify the wording and intent of the policy.	Accept modification
Policy SINDP13 – Dark Skies		
Delete Policy SINDP13	Deletion of policy because proposals were seeking to introduce requirements that go well beyond the capabilities of land use planning.	Accept modification
Supporting text, page 26, change wording of last two sentences to: "…and ambience and the Parish Council is keen to ensure that external lighting requiring planning permission be kept to an absolute minimum. South Downs Local Plan Strategic Policy SD8 requires development to conserve and enhance the intrinsic quality of the area's dark night skies."	Given the importance of Dark Night Skies to support local character, the supporting text will be changed to link to SDLP SD8.	Accept modification

Recommended Modification to the SINDP	Justification	Decision
Policy SINDP14 – Tranquillity		
Change second line of the Policy to: "…of the Neighbourhood Area once construction is..."	To provide clarity on the wording used.	Accept modification
Policy SINDP15 – Landscape and Views		
Delete all text after the end of bullet point (viii) ("Where…demonstrated.")	Deletion of part of policy criterion to provide clarity.	Accept modification
Policy SINDP16 – Parish Heritage Assets		
Delete the first paragraph of text: "Development proposals…SINDP MAP")	To provide clarity on the wording used.	Accept modification
Change second line of second para to: "Parish Heritage Assets (as per the list of Parish Heritage Assets appended to the Neighbourhood Plan) should describe the impact of the development on the significance of the heritage asset." And delete the rest of the paragraph.	Supporting text introduced a different approach to non-heritage assets than is justified in national policy; deletion of part of policy to provide clarity.	Accept modification
Remove the list of Parish Heritage Assets and replace in an Appendix to the Neighbourhood Plan.	Recommendation from Historic England to allow changes over the duration of the plan period.	Accept modification
Supporting text, page 32, delete last three lines and replace with: "This has identified a number of buildings, groups of buildings or structures considered to be worthy of protection. These are listed in an Appendix to the Neighbourhood Plan."	Deletion of part of policy to provide clarity.	Accept modification

Recommended Modification to the SINDP	Justification	Decision
Policy SINDP17 – Barn Conversions		
Change first sentence to: "Development proposals involving traditional barns should respect the significance of the barn..."	To provide clarity on the wording used to be in line with national policy.	Accept modification
Supporting text, delete the penultimate sentence: "Unconverted…resort." And change last sentence to: "When a barn is…"	To provide clarity on the wording used, to be in line with national policy.	Accept modification
Policy SINDP18 – Sunken Lanes and Retaining Walls		
Change to: "The preservation of the old sunken…Map, will be supported…distinctiveness of a sunken lane will not be supported"	To provide clarity on the wording, as current wording is not clear.	Accept modification
Policy SINDP19 – Permissive and Public Rights of Way		
Change the policy wording to: "The protection and enhancement of public rights of way, including the provision of new pedestrian and cycle routes, will be supported."	Change of wording to provide clarity and to be in line with national policy, as RoW are by definition protected by law.	Accept modification
Policy SINDP20 – Car Parking		
Policy SINDP20, delete second sentence "Residential…per dwelling" and parts (2) and (3).	Change of policy wording to be in line with national policy para 39 and the adopted SDLP, as current approach is not supported by substantive evidence.	Accept modification

Recommended Modification to the SINDP	Justification	Decision
Replace parts (2) and (3) with: "The provision of new parking spaces will be supported, subject to it being demonstrated that they respect local character, residential amenity and highway safety."	Change of policy wording for clarity and to be in line with national policy para 39.	Accept modification
Policy SINDP21 – Maintaining and Improving Accessibility		
Delete text and replace with: "The development of shared space environments, providing pedestrians with priority over motorised traffic, will be supported. Development that would reduce accessibility for pedestrians and/or cyclists will not be supported. The development of facilities for cyclists, including the development of safe cycling routes and the provision of secure bike parking/storage will be supported."	Current approach of policy does not have regard of rural nature of the Neighbourhood Area and the absence of information leaves the intent unclear. Change of wording to provide clarity and intent of the policy.	Accept modification
The Neighbourhood Plan: Other Matters		
Update the Contents and where necessary, Policy, paragraph and page numbering, to take into account the recommendations contained in this Report.	These modifications are for clarity and to ensure consistency with other recommended modifications.	Accept modification