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Mr Ashcroft  
c/o Horsham District Council  
Parkside  
Chart Way  
Horsham  
West Sussex RN12 1RL

16 November 2021

Dear Mr Ashcroft,

The Parish Council would like to thank you for kind words regarding the neighbourhood plan. Great care has been taken to ensure the vision was concise and policies reflected the needs and character of the parish.

The Parish Council welcomes this opportunity to provide clarifications requested and would ask that if any further queries arise out of the comments below that we are approached again for comment.

For clarity, this letter sets out your comments verbatim in a box, followed by the response from the Parish Council.

### Consultation and Engagement

*Does the Parish Council have any observations on the extent to which it fully engaged with local residents, landowners and interested parties during the preparation of the Plan?*

The consultation and engagement activities undertaken are set out in the Consultation Statement submitted alongside the plan.

We do not wish to duplicate the Consultation Statement in this letter but can confirm that we have engaged with residents, landowners and interested parties in the preparation of the Plan. This has been through a combination of informal engagement and events, and then statutory consultation in accordance with the regulations.

We note that the amount of consultation waned towards the end of the plan preparation process - this is mainly due to the time constraints set out in the plan and the desire to get a plan in place. This change in the amount of consultation is particularly noticeable to stakeholders, as a great deal of engagement was undertaken earlier in the process. Towards the end, and to ensure the plan could progress to submission in a timely manner, consultation was undertaken in line with regulations and guidance.

*In particular does it have any observations of the specific representations which address this matter?*

Regarding specific representations, we note that concerns have been raised by some about the consultation process relating to proposed Local Green Spaces. This topic is considered in the Consultation Statement (page 23) and our response at this time remains the same.

*In a broader sense to what extent does the Parish Council consider that it has developed a shared vision 'for the neighbourhood plan area' and has identified 'the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area' as anticipated in Planning Practice Guidance 41-001-20190509?*

We accept that views in our community are diverse, but the Parish Council believe that overall, the submitted Neighbourhood Plan provides a shared vision for the area.

The vision for Steyning is concise and succinct and aims to tackle the key issues which the parish faces. The vision was formed by considering responses received prior to and during the Regulation 14 Consultation which occurred in the summer of 2019. Of note was the Vision Statement Survey which ran in 2018, as described within the Consultation Statement, which enabled the community to have a direct involvement in the production of the long term vision so that it catered for their specific wants and needs and their ambitions for the future of the parish.

Paragraph 41-001-20190509 of the National Planning Practice Guidance (NPPG) does not set out a list of things that a neighbourhood plan must do. Instead, this paragraph provides a synopsis of what neighbourhood planning could do, intended to inform those looking into neighbourhood planning of the potential benefits. Paragraph 41-001-20190509 states:

*Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.*

This should also be read alongside National Planning Policy Framework (NPPF) para 29 which states:

*Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies*

When read in full both the NPPF and NPPG neighbourhood planning gives our community the power to develop a shared vision for their area. This has been done as best possible given the opposing and vocal views of differing parts of our community.

The NPPF and NPPG does not require a neighbourhood plan to identify 'the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area'. Instead, they merely confirm that neighbourhood planning provides a community with powers to do so if it wished. In this case, a plan has been progressed which does not allocate land for development, and we are pleased to note that this approach is supported by Horsham District Council in their response to the Regulation 16 consultation.

Regardless of the above discussion, the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area. That includes those of the South Downs National Park and the Horsham District Planning Framework. To this end, no part of the neighbourhood plan conflicts with the adopted Development Plans of either Local Planning Authority (LPA).

### **Broader development within the Plan period**

*The neighbourhood plan has been prepared and submitted whilst the emerging Local Plan is being developed. This process has taken place within the context of the wider neighbourhood plan protocol in the district, and section 3 of the Plan comments about decisions which were taken to press ahead with the neighbourhood plan in mid-2019. The submitted Plan proposes the designation of parcels of land in general, and on the immediate edge of the built part of the village in particular, as local green spaces in advance of a broader understanding of the longer-term development requirements in the district in general, and in the neighbourhood area in particular. In addition, it does not allocate sites for development.*

*In this context:*

- is this approach taken in the Plan appropriate in setting a context for future growth in the neighbourhood area?*
- has the Parish Council considered how and when it would review any 'made' neighbourhood plan once the emerging Local Plan has been adopted?*

We note that your comments are framed in the context of Horsham District, however it is important to note that the Plan Area falls into two LPAs, Horsham District Council (HDC) and the South Downs National Park Authority (SDNPA). We would like to respond to each of your points in relation to both areas. At all times in the preparation of the neighbourhood plan we have been very aware of the strategic context.

Regarding the area within SDNPA, a new Local Plan was adopted by the SDNPA very recently in July 2019. This plan sets out the strategic aspirations for the area between 2014-2033, including where development should occur in these years. It is also worth noting that this plan (whilst not yet adopted) was largely in the public domain for much of the time our neighbourhood plan was being prepared. As the neighbourhood plan was being prepared there was great care to ensure that there would be no conflict with strategic policy contained in SDNPA's adopted development plan. In the context of knowing where development and longer-term growth is planned to come forward in the SDNPA it is entirely appropriate to then designate parcels of land as local green space where appropriate. The proposed designations do not conflict with the recently adopted development plan for the area which provides a framework, and the context, for future growth in the plan and wider area.

Regarding the area within HDC, your summary is correct in that the neighbourhood plan was prepared without knowing the detail of the emerging plan. However, close communication was had with key personnel at HDC throughout to discuss and agree the relationship between policies in the emerging

neighbourhood plan, the adopted development plan and the emerging local plan (to the extent it was known by those at HDC). This is the approach advocated in the NPPG (Reference ID: 41-009-20190509) 'to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan'. One such area of agreement was that the neighbourhood plan would not include sites for residential development. We now have the benefit of having sight of the emerging HDC local plan and, although it has not yet proceeded to consultation (due to recent updates to the NPPG and latterly the new requirement for water neutrality) are pleased to see that there are no apparent conflicts between the proposed neighbourhood plan and emerging local plan.

The Parish Council have made a resolution to review the plan at their meeting on 15/11/2021. This review will be triggered by the inclusion of new planning policy in the adopted Development Plan that is relevant to the neighbourhood plan area. Such a review will be open to include any relevant matters but will include consideration of the delivery of new homes, our economy, open space, and climate change.

The neighbourhood plan already confirms at para 1.14 that when the emerging Horsham Local Plan is adopted it would be reviewed. Given the resolution by Full Council we would suggest that paragraph 1.14 be updated to read:

*'However, Horsham District Council are currently preparing a new Local Plan for the district which will replace this document in the next few years. This new document may change the strategic spatial strategy for the wider area meaning this plan will need to be reviewed on adoption of the new Local Plan.'*

We also suggest a new section is added after para 1.17:

#### **'Plan Review**

*Given the reduced scope of this plan, the Parish Council have made a resolution to review the plan at their meeting on 15/11/2021. That review will be triggered by the inclusion of new planning policy in the adopted Development Plan that is relevant to the neighbourhood plan area. This review will consider whether the Steyning Neighbourhood Plan still aligns with strategic policy, and include consideration of the delivery of new homes, design codes, our economy, the high street, open space, transport, infrastructure, Local Green Space, the climate change emergency and another matters considered relevant at that time.'*

#### **Policy SNDP1**

*The first part of the policy is well-intentioned. However other than in relation to the six general matters listed in the policy did the Parish Council seek to define any specific parts of the neighbourhood area to which it would apply?*

The policy applies to the whole plan area. Defining 'Valued landscape features' on the policies map was considered when the policy was drafted, however most of the Parish contains 'Valued landscape features' such as those listed in SNDP1.1 and there was and is concern that in trying to map them we may miss as many 'Valued landscape features' as we identify. As a result, a criteria-based policy was introduced to allow judgements to be made by the decision maker on a site-by-site basis. Such criteria-based policies are common place in Local Plans. We strongly disagree with the comments made by HDC in relation to this policy.

*To what extent does the second part of the policy add value to national policy?*

It is noted that NPPF paras 8, 32, 174(d), 179(b) and 180(d) all encourage development to deliver biodiversity net gain. It is accepted that SNDP1 largely mirrors this requirement. However, it also adds to national and local policy by also providing policy support for proposals that '*would increase the amount of publicly accessible green infrastructure*'. The policy therefore builds on national policy and introduces a locally specific policy requirement.

## **Policy SNDP2**

*To what extent does the policy add any distinctive local value to national and local policies?*

The distinctive local value of the policy is that it sets out the aspirations of a large part of our community. NPPG para 41-001-20190509 and NPPF para 29 confirm that neighbourhood planning gives our community the '*power to develop a shared vision for their neighbourhood*'. This policy includes what is possibly the most important set of requirements for new development to parts of our community and helps build on that shared vision.

This topic is particularly important to our local community and is demonstrated in some part by several local community groups and organisations who are trying to make our lives more sustainable. Examples of such groups include, but are not limited to, Greening Steyning, Steyning Downlands Scheme, the Steyning & District Business Chamber, Steyning for Trees and the Steyning Grammar School Eco Council to name a few.

SNDP2.1 requires development to consider the impact it will have on the environment over its lifetime. Currently, the adopted development plan does not take this properly into account. For example, the long-term carbon footprint or the impact of materials used is not currently a material consideration, it is hoped that this policy will address that.

SNDP2.2 builds upon existing national and local requirements to explicitly identify those elements that locally we value and want to see. The design criteria are drawn from the Character Appraisal which is submitted alongside the plan.

Overall, the policy seeks to ensure that development is responsibly designed taking its environmental impacts into account.

*I am minded to recommend that the second part of the policy is modified so that it takes a proportionate approach. This would acknowledge that many development proposals in the Plan period will be of a minor or domestic nature. Does the Parish Council have any comments on this proposition?*

We note the point made but strongly believe that all development should try and accord with the requirements (even householder proposals) but do accept that it may not always be possible. If a proportionate approach required, we would suggest that the opening sentence be reworded to state:

*'As a minimum all developments should accord with the National Design Guide and where possible.'*

## Policy SNDP5

*As submitted the policy reads as a process matter (how the Parish Council will apply developer contributions) rather than a policy in its own right. Please could the Parish Council advise on its intentions for the policy?*

We note the point made and agree that it may be better placed in the text. We would suggest that the policy is deleted and para 6.6 and 6.7 replaced with the following:

*6.6 In England, where there is a neighbourhood plan in place, the neighbourhood is entitled to 25% of CIL revenues from new development taking place in the Plan Area (for areas without a neighbourhood plan, the neighbourhood proportion of CIL is a lower figure of 15%, capped at £100 per dwelling for residential development). This money is paid to Parish Councils to spend on local priorities.*

*6.7 CIL funds raised by development within the Plan Area and paid to Steyning Parish Council will be used to support infrastructure projects identified as a priority by the Parish Council. The Parish Council will maintain an Infrastructure Delivery Plan identifying priority infrastructure projects.*

## Policy SNDP6

*Plainly this policy is at the heart of the submitted Plan. The Local Green Space (LGS) Review has helpfully assessed the potential designation of parcels of land as LGSs in the parish.*

*I am satisfied that the proposed Fletcher's Croft LGS meets the three tests in paragraph 102 of the NPPF. The Review has principally assessed each parcel of land considered to have the potential to be designated as a LGS against the three criteria in paragraph 102 of the NPPF. Has the Parish Council separately assessed each proposed LGSs against the more general matters in paragraph 101 of the NPPF, namely:*

- whether their designation is consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services?*
- the extent to which it is capable of enduring beyond the end of the plan period?*

The whole plan has been prepared having regard to national policies and advice contained in guidance issued by the Secretary of State. This contains the fundamental purpose of the planning system which is to contribute to the achievement of sustainable development. In line with this, the designations proposed in the plan are consistent with the local planning of sustainable development.

As set out previously in this letter, in SDNPA there is a relatively new local plan which provides a framework for future growth and in HDC we have worked with officers as the plan was prepared. None of the proposed designations conflict with proposals for homes, jobs and other essential services in either of the relevant adopted development plans.

Regarding the proposed Local Green Space (LGS) designations enduring beyond the end of the plan period, we see no reason why they could not. We acknowledge that there are stakeholders who have promoted land for development in the area, but that should not be a reason to not designate a LGS when it meets the tests set out in the NPPF.

*Paragraphs 3.18 to 3.21 of the Review address the issue of the relationship between the protection afforded by the location of a parcel of land within the South Downs National Park and any added protection which would follow from a LGS designation. Am I correct to infer from paragraph 3.21 of the*

*Review that the Parish Council has concluded that there is a general benefit to designating parcels of land (which meet the test of paragraph 102 of the NPPF) within the National Park as LGSs?*

That is correct.

*Has the Parish Council undertaken a site-by-site assessment of each proposed LGS within the National Park on the added value of such a designation over and above national park status as required by Planning Practice Guidance 37-011-20140306?*

'Stage 3 – Validation' (from page 44 of the Local Green Space evidence base document) considers whether each parcel of land being assessed is already protected by designation, then forms a view on whether any additional local benefit would be gained by designation as Local Green Space. Where spaces are within the National Park this is noted in overview and outcome of the assessment of that space. In short, yes, a site-by-site assessment has been undertaken.

*From my observations in relation to the proposed LGS 2 (The Rifle Range) it appeared that the former rifle range consisted of the strip of land in the western part of the proposed designation. Were my observations correct and/or is there historic evidence to support the use of the wider parcel of land as a firing range? What is the significance of the pond and the downstream mill as set out in the Historic significance section in the Review (page 14) relating to this proposed LGS?*

The proposed 'The Rifle Range' LGS is, on reflection, poorly named. The area does indeed include part of the old rifle range (running broadly East/West across the northern part of the proposed designation) but also includes the valley to the south which has several ways in which it is demonstrably special to the local community, such as beauty, recreational value, tranquility and wildlife. To clarify this we suggest renaming the proposed LGS to 'Rifle Range & Valley'.

The significance of the pond is that is upper reservoir for the historic mill downstream and has been a permanent feature in our landscape for many years.

*To what extent did the consideration of the proposed package of LGS designations take account of the contents of the Wiston Whole Estate Plan?*

The Wiston Whole Estate Plan is a document prepared by the landowner of the estate. It set out the assets of the organisation and the opportunities and threats which the organisation may encounter and describes their plans for the future. The SDNPA confirms that a Whole Estate Plan should include environmental and social assets and issues as well as economic development projects. The concept is to encourage open dialogue between land owning organisations and the National Park, to look at land holdings in their entirety in order to be as holistic as possible.

Whole Estate Plans have an interesting position in the policy makeup of the national park. The SDNPA Local Plan refers to them in two policies:

- Policy SD23 confirms that development proposals for visitor accommodation, visitor attractions and recreation facilities will be permitted where compliance can be demonstrated that seven criteria are met. One part of one criteria refers to a proposal being '*part of a farm diversification schemes or endorsed Whole Estate*'.

- Policy SD25 provides a development strategy for the National Park. It confirms that when *'considering development proposals outside settlement boundaries within rural estates and large farms'*, positive regard will be had to two factors, one of which is the inclusion of the development proposals within an endorsed Whole Estate Plan.

The Wiston Whole Estate Plan (WWEP) includes a number of projects such as Great Barn (Conversion of existing listed barns and upgrading of modern farm buildings to create new retreat accommodation, refectory, chapel, market garden and 'trailside' café and to improve the facilities of this rare breed organic beef Farm) and Rock Common Quarry (A new ecology focused visitor destination incorporating an eco-lodge development set within the restored sand quarry). These specific projects would benefit from policy support from SD23 and SD25.

The WWEP is a material consideration in the determination of certain planning applications. But being a material consideration in the determination of a planning application should not be confused with being part of the adopted development plan for the National Park, of which the WWEP is not.

The WWEP also plays no part in key strategic matters set out in the Local Plan. An example of this can be seen when comparing the content of the WWEP, and the delivery of new homes across the National Park. Policy SD26 confirms the distribution of new homes and how they will come about – no reference to Whole Estate Plans is made.

The WWEP is not part of the development plan. The inclusion of a project (such as those outlined above) in the WWEP is a material consideration in the determination of a planning application but the WWEP has little, if any, bearing on the preparation of a neighbourhood plan which must meet the basic conditions.

The Wiston Estate in their response have directed us to page 78 and 79 of the WWEP which considers Local Housing Needs. Here the WWEP talks of how it will work *'alongside local Neighbourhood Planning groups to enable future housing for the future sustainability of a diverse community.'* It also sets out a vision to create *'high quality homes for estate workers [former, current and new], local people and those wishing to join the community with a strong sense of place supported by the provision and shared maintenance of community buildings and open space'*. We commend this aspiration and the objective to *'increase the availability of housing suitable for those engaged in stewardship, landscape and estate management; to add to the stock of affordable housing available locally and to provide new homes for 'down-sizers' and young families to enable the sustainable growth of this important local service centre.'* However, the WWEP stops short of identifying specific projects like it does elsewhere in the document and only through inferring meaning into the illustrative map annotated with *'Recommended by the neighbourhood plans'* and *'Not currently recommended by the neighbourhood plans'* could a potential project be identified.



## **Comments on Representations**

We have been provided with the opportunity to comment on specific representations as we see fit.

Before we do that, we would like to take this opportunity to thank everyone who has taken the time to respond to the Regulation 16 Consultation, and consultations before that – regardless of whether those responses are supportive or raising concerns.

### Horsham District Council

We would like to thank HDC for their kind words in relation to the efforts of those involved.

We note the confirmation from HDC that they support our position of not allocating land for development.

As set out above, we disagree with HDC's comments regarding Policy SNDP 1 and SNDP 2. Both of these policies, and the current wording of them, are crucial in setting out local development requirements.

Other changes requested are minor and relate to paragraph wording / formatting and we have no issue with any of them. However, we are keen to ensure that the plan does not become out of date and therefore do have reservations with the prospect of linking documents such as the Local Plan timetable which can have a short shelf life.

### Richborough Estate

We note the comments and concerns expressed by Richborough Estate. We have reviewed the representation in detail and believe that the main matters are already addressed in this letter.

### South Downs National Park Authority

We would like to thank SDNPA for their kind words in relation to the plan and the presentation of it.

We note that the SDNPA consider the neighbourhood plan to be in general conformity with these strategic policies of the SDLP, as we have set out above.

We believe that the remainder of the comments raised are already addressed in this letter.

### Cala Homes

We note the concerns made but would advise the Examiner to refer to the Local Green Space evidence base document for our position in relation to 'Sweetland'.

### The Wiston Estate

We again note the concerns raised by the Wiston Estate, but do not propose to make any further comment as we believe that the pertinent matters have already been addressed in this letter.

## Final Remarks

It is apparent that the Steyning Neighbourhood Plan, as submitted by the Parish Council, has attracted both support and criticism from our community and other Stakeholders. We would like to reiterate that through this process, the Parish Council has sought to work with our community and relevant stakeholders to develop the neighbourhood plan. It aligns with the overarching strategy for growth as set out by the two relevant LPA's, meets the basic conditions, and should in our opinion be allowed to proceed to referendum.

However, we do note the concerns raised by some and therefore offer the following commentary without prejudice to our position that the plan as submitted meets the basic conditions. The Parish Council are committed by way of a resolution by Full Council on undertaking a review of the neighbourhood plan as soon as the emerging Horsham District Local Plan is adopted, or other policy is brought into the adopted development plan for the neighbourhood plan area. This review will likely result in a plan with a wider scope than the one currently submitted. Objections to the submitted plan appear to focus on the designation of some Local Green Spaces, citing their incompatibility with the future growth of the area and arguing they conflict with sustainable development. We disagree with this assessment but if the examiner were to agree, we suggest designations of concern are removed by the Examiner at this time to enable the plan to proceed to referendum. The Parish Council would then reconsider the removed designations alongside any proposals for development by stakeholders, as part of the upcoming neighbourhood plan review.

We trust that this letter provides a useful response to your Clarification Note and we look forward to receiving your report on our neighbourhood plan.

Kind regards,



John Fullbrook

Steyning Parish Council Clerk

{On behalf of Steyning Parish Council}