

## **Steyning Neighbourhood Development Plan**

### **Examiner's Clarification Note**

This Note sets out my initial comments on the submitted Plan. It also sets out areas where it would be helpful to have some further clarification. For the avoidance of any doubt matters of clarification are entirely normal at this early stage of the examination process.

#### ***Initial Comments***

The Plan provides a concise vision for the neighbourhood area. It develops a series of distinctive policies which get to the heart of the character and the appearance of the neighbourhood area.

#### ***Points for Clarification***

I have read the submitted documents and the representations made to the Plan. I have also visited the neighbourhood area. I am now in a position to raise issues for clarification with the Parish Council.

The comments made on the points in this Note will be used to assist in the preparation of my report and in recommending any modifications that may be necessary to ensure that the Plan meets the basic conditions.

The clarification points below fall into two categories. The first category raises general matters about the content of the Plan. Thereafter the second category raises questions on a policy-by-policy basis in the order in which they appear in the submitted Plan.

The National Planning Framework was updated in July 2021. In responding to some of the questions in the second category it would be helpful if the Parish Council took this matter into account

There is also an opportunity for the Parish Council to respond to the representations made to the Plan.

#### ***Consultation and Engagement***

Several of the representations comment about what they consider to have been a limited consultation and engagement process on the Plan.

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?

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

In a broader sense to what extent does the Parish Council consider that it has developed a shared vision' for the neighbourhood 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?

#### ***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?

There are detailed questions on the Plan's proposed package of local green spaces later in this Note

#### *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?

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

#### *Policy SNDP2*

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

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?

#### *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?

#### *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?

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?

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?

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?

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

### ***Representations***

Does the Parish Council wish to comment on any of the representations made to the Plan?

In particular does it wish to comment on the representations from:

- Horsham District Council;
- Richborough Estate;
- The South Downs National Park Authority;
- Cala Homes; and
- The Wiston Estate.

***Protocol for responses***

I would be grateful for responses to the points in this Note by 17 November 2021. Please let me know if this timetable may be challenging to achieve. It is intended to maintain the momentum of the examination.

In the event that certain responses are available before others I am happy to receive the information on a piecemeal basis. Irrespective of how the information is assembled please could it come to me directly from the District Council. In addition, please can all responses make direct reference to the policy or the matter concerned.

Andrew Ashcroft

Independent Examiner

Steyping Neighbourhood Development Plan.

29 September 2021