

**UBNP: Pre-Submission Plan Schedule of Statutory Consultees<sup>1</sup>  
Representations and Recommended Responses**

June 2018 – August 2018

Officer / Department	Organisation	Representation	Steering Group's Agreed Recommendations
<b>General</b>			
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	Upper Beeding, together with the neighbouring settlement of Bramber is identified as a small town/large village in the settlement hierarchy in Policy 3 of the adopted Horsham District Planning Framework (HDPF). Consequently, there is an expectation that emerging neighbourhood plans are required to accommodate its fair proportion of the minimum 1,500 dwellings to be delivered from Neighbourhood Plans across Horsham in accordance with Policy 15 (4). The delivery of around 109 dwellings and accompanying infrastructure along with recent permissions within the village is considered to be proportion to the scale and size of the village in accordance with Policy 3: Settlement Hierarchy, taking account of the not insignificant environmental constraints which exist in this area.	Thank and noted. No changes made.
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	As you will know, the revised NPPF was published on 24 July 2018. It will be necessary to ensure that reference to the updated paragraphs are provided in the plan where relevant. This will bring reassurance to the Examiner that the plan has been positively prepared and every endeavour has been made to ensure the plan is in general conformity with national planning policy which as	Thank you and noted. References to the newly published 2018 NPPF have now been made within the NP.

<sup>1</sup> Please note – no response was received from Historic England despite a number of reminders being sent to them.

		you are aware is one of the key Basic Conditions by which the Neighbourhood Plan will be assessed against.	
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	Wherever the plan states 2033, please replace with 2031.	Thank you and noted. These have been updated.
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	Replace reference to 'Proposals Map' with the term 'Policies Map' as this is the terminology used in planning legislation. The Policies Map shows allocations and designations arising from policies in the local plan or Neighbourhood plan and at the current time these are not sufficiently clear. The Policies Map should be a map which:(i) identifies the location and boundaries of allocations and designations;(ii) is reproduced from, or based on, an Ordnance Survey map;(iii) shows National Grid lines and reference numbers; and(iv) includes an explanation of any symbol or notation which it uses.	Thank you and noted. These have been updated.
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	Footnotes Need updating 18 <a href="http://www.southdowns.gov.uk/planning/planning-policy/nationalpark-local-plan/evidence-and-supporting-documents/strategic-housingland-availability-assessment-shlaa">http://www.southdowns.gov.uk/planning/planning-policy/nationalpark-local-plan/evidence-and-supporting-documents/strategic-housingland-availability-assessment-shlaa</a> 34 <a href="https://flood-map-forplanning.service.gov.uk/summary/519228/110703">https://flood-map-forplanning.service.gov.uk/summary/519228/110703</a> 36 <a href="http://snafpacc.horsham.gov.uk/AnitePublicDocs/01464499.pd">http://snafpacc.horsham.gov.uk/AnitePublicDocs/01464499.pd</a> 41 Paragraph 77 100 (Link works but paragraph number is now wrong).	Thank you and noted. These have been updated.

Hannah Hyland	Environment Agency	<p>Flood Risk</p> <p>We note that a Sequential Test has been produced to support the Plan which we have reviewed. We would look to Horsham District Council to confirm whether they are satisfied that the Sequential Test (ST) has been passed, however, we have some concerns as to the approach taken. The presentation of outputs shows that, with the exception of sites in FZ1, the ST has not been passed but despite this you have progressed to the Exceptions Test. In accordance with paragraph 157 of the National Planning Policy Framework and associated Practice Guide you need to demonstrate that the ST has been met before moving on to the Exception Test. This may be a matter of presentation but we would recommend in discussion with Horsham DC this is amended prior to the Neighbourhood Plan being submitted. We note that other sites have been identified at lower flood risk and we would again ask Horsham DC to be satisfied with the justification that these should not be taken forward.</p> <p>Notwithstanding the Sequential Test it is important that your Plan also considers whether the flood risk issues associated with these sites can be safely managed to ensure development can come forward</p>	Thank you. The Sequential Test has been updated following further communication between Horsham DC and the EA on this matter.
South Downs National Park		The Neighbourhood Plan refers on numerous occasions to the 'Setting of the National Park' when we think in fact the Plan is actually seeking to refer to the wider National Park designation and not just its setting. The setting of a designation or area is defined as land outside the designation but part of the immediate and extended environment that contributes to its significance and distinctive	Thank you and noted. The NP has been updated across a number of sections in the NP in accordance with your comments regarding 'setting'.

		<p>character. We advise careful and correct use of the terminology 'setting'. We have made some recommendation in the table below to help refine policies to ensure that they do not conflict with the emerging South Downs Local Plan (SDLP) and respect the purposes and duty of the South Downs National Park Authority (SDNPA). We also set out some detailed comments and policy recommendations on Policy 3: Land East of Pound Lane, Policy 5: Land at Greenfields, Henfield Road and Policy 7 – Land at Valerie Manor, Henfield Road, Upper Beeding.</p>	
West Sussex County Council		<p>In considering the Neighbourhood Plan for Upper Beeding the size and location of proposed site allocations have been taken into account when considering if further transport evidence is required at this stage. The overall level of development proposed in the Upper Beeding Neighbourhood Plan is in accordance with the forecast estimate of background traffic growth assumed in the Strategic Transport Assessment. The Strategic Transport Assessment indicates that there will be no severe impacts on the transport network that cannot be mitigated to a satisfactory level. The County Council considers that this provides sufficient evidence to justify the overall level of development proposed in the Upper Beeding Neighbourhood Plan. Therefore, it is not necessary to produce further transport evidence before allocating the sites proposed in the Neighbourhood Plan for Upper Beeding.</p>	Thank you and noted. No changes made
West Sussex County Council		<p>Horse riding - Horse riding is only acknowledged in the Countryside and Environment SWOT analysis. Given the close proximity to the Downs, where a multitude of bridleways are available, and that the Downs Link and South Downs Way run through the</p>	Thank you and noted. Whilst it is acknowledged that horse-riding is an important activity within the parish, policies within the NP have been developed through the evidence base and this issue has not

		parish, which are both popular with equestrians, a greater recognition of horse riders and their needs would have been expected and welcomed in the document.	been identified as one to take forward into a policy. In addition, community aspiration 2 provides suggestions for improved footpaths and bridleways. Horse-riding has been added to this aspiration. This subject matter is covered in detail within the Submission South Downs Local Plan.
<b>Chapter 1</b>			
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	Para 1.2 The policies will aim to <del>protect</del> <b>conserve and enhance</b> the special character of the parish and to encourage development proposals for the benefit of the local community	Thank you. Change has been made.
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	Introduction (Para 1.1) '(HDC))' Minor typo.	Thank you. Change has been made.
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	Introduction Para. 1.7 'If a majority of the turnout votes for the plan, <b>then the plan will be</b> 'made' as formal planning policy for the area <b>and part of Horsham District Council's Statutory Development Plan. This means the plan will be used to determine planning applications in the area'</b>	Thank you. Change has been made.
South Downs National Park		Planning Policy Context Given that two-thirds of the parish lies within the SDNP, we would wish to see greater reference in this section, as has been done for the Horsham District Planning Framework, to relevant policies in the emerging SDLP. The SDLP has now been submitted for Examination and it is intended that it will be adopted early next year. Currently this section only refers to SDLP Strategic Site Policy SD56: Shoreham Cement Works. List relevant policies to the Neighbourhood Plan as set out in the SDLP. The National Park can provide a list if needed.	A new table containing key policies for the NP has been inserted within the relevant chapter.

<b>Chapter 2</b>			
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	Para 2.17 'a) Henfield and Small Dole Farmlands... In the case of a) it is of <del>moderate</del> <b>high</b> sensitivity to change due to the high visibility and intrinsic landscape qualities'.	Thank you. Change has been made.
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	Para. 2.18 'However, there may be cases where <del>small</del> <b>appropriate</b> scale development	Thank you. Change has been made.
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	Para. 2.3 '(see Horsham District's Inset Proposals Policies Map 15)4.'	Thank you. Change has been made.
<b>Chapter 3 - Planning Policy Context</b>			
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	<input type="checkbox"/> Supporting a prosperous rural economy (paragraph 28 83 to 84) <input type="checkbox"/> Good Design (paragraph 58 125) <input type="checkbox"/> Protecting Promoting healthy communities (paragraph 70 91 to 95) <input type="checkbox"/> Protecting local green spaces (paragraph 76 99 to 100) <input type="checkbox"/> Conserving and enhancing the natural environment (paragraph 109 170) Conserving and enhancing the historic environment (paragraph 126 184) <input type="checkbox"/> Neighbourhood Planning (paragraph 185 29)	This has been updated in the NP. Instead of just changing the paragraphs as suggested – the NPPF 2018 has been considered and the whole section updated.
<b>Chapter 4 – Community Views on Planning Issues</b>			
<b>Chapter 5 - Vision &amp; Objectives</b>			
South Downs National Park		While we welcome the importance given in the Vision to protecting the National Park, we recommend some re-wording to improve clarity and so that the Vision reflects National Park purposes and duty. We are also not clear what is meant by a shared plan, what type of document this will be and what its status in planning terms is. We consider that the first sentences of the Vision are sufficient to convey the aim of the NDP to protect the National Park and the desire for joint	Thank you. The NP has been changed to take on board the suggested amended text.

		partnership working between the Parish Council and the SDNPA. This partnership working can be implemented through joint community projects. We recommend the deletion of the last sentence of the first paragraph of the Vision. Suggested text provided.	
South Downs National Park		Objective 1 We recommend some re-wording of this objective to improve its clarity and so that the wording it is in line with National Park purposes and duty	Thank you. The NP has been changed to take on board the suggested amended text.
South Downs National Park		Objective 6 We recommend that this objective refers to improving connections from Upper Beeding to the South Downs Way and the Downs Link.	Thank you. The NP has been changed to take on board the suggested amended text.
West Sussex County Council		Vision - In the first paragraph of the vision, it refers to working with SDNPA to create, amongst others, improvements for pedestrians and cyclists. WSCC, being the local highway authority, could deliver improvements for these modes too. It is suggested that WSCC is added to this paragraph.	Thank you. The NP has been changed to take on board the suggested amended text.
<b>Chapter 6 – Spatial Strategy</b>			
South Downs National Park Authority		Spatial Strategy; Para 6.1 While welcoming this list of aims, the second one in this list refers to the 'parish and its setting in the National Park. As explained above setting is land outside a designation and over two-thirds of the parish lies within the National Park. We understand that the National Park landscape provides the setting to Upper Beeding and Small Dole villages but not to the Parish as a whole. The third aim largely repeats the second one, we therefore suggest this is deleted. In terms of the sixth aim: (Develop a green infrastructure plan that improves recreation and leisure opportunities within the Park for the community), there is also potential to improve connections from the Parish to the South	The list at paragraph 6.1 is one that has been gathered through community engagement sessions as part of the early evidence gathering for the NP. It is considered, therefore, that it should remain as such and that new considerations (such as including references to South Downs way) are not included at this point. However, changes to the text that improve clarity have been made.

		Downs Way and the South Downs Link. For clarity, this aim should say National Park rather than Park. The 10 <sup>th</sup> aim should refer to Shoreham Cement Works rather than just Cement Works.	
<b>Chapter 7 – Policies and Proposals</b>			
South Downs National Park Authority		Shoreham Cement Works; Para 7.22 We welcome the reference to the Shoreham Cement Works Area Action Plan (AAP) and the involvement of the Parish Council in that process. The Neighbourhood Plan community aspirations for the site are also noted.	Noted thank you
<b>POLICY 1 – SPATIAL PLAN FOR THE PARISH</b>			
South Downs National Park Authority		Policy 1: Spatial Plan for the Parish: Fourth sentence. The last sentence of this policy refers to the setting of the National Park when it should refer to the National Park designation as a whole.	Thank you. This change has been made.
West Sussex County Council		The County Council have no overriding concerns about the transport impacts of the Upper Beeding Neighbourhood Plan. However, given that the pre-submission Neighbourhood Plan for Upper Beeding includes the proposed allocation of small scale housing sites, it should be noted that site specific matters in the Neighbourhood Plan will need to be tested and refined through the Development Management process (through the provision of pre-application advice or at the planning application stage) or as part of a consultation for a Community Right to Build Order. Whilst the County Council supports the proactive approach undertaken to allocate sites in the Neighbourhood Plan, we are unable to comment on site specific matters at this stage. In considering site specific matters, please refer to the attached Development Management guidance.	Thank you and noted. Where appropriate, reference will be made in the site specific policies regarding transport implications and the need to work with WSCC as part of the planning application process.

<b>POLICY 2 – HOUSING ALLOCATIONS</b>			
<b>POLICY 3 – LAND EAST OF POUND LANE, UPPER BEEDING</b>			
Henry Adams on behalf of WSCC as landowners (relates to strip of land at Smugglers Lane only)	WSCC	This statement outlines that they [West Sussex County Council] support the draft housing allocation in principle, however, on behalf of the landowner we wish to make comment on the proposed allocation, whilst referring to specific areas of the National Planning Policy Framework.	Noted and thank you.
Henry Adams	WSCC	The total site is approximately 3.92 hectares to provide 70 dwellings at 18 dwellings per hectare. This is a low density; therefore, any unit numbers proposed should offer an 'at least' figure.	Low density is appropriate across the allocated site for a reason. AECOM suggested a yield range of 10-26 units for the Smugglers Lane site within their site assessment report. The site is currently located outside of the development boundary and contains a number of constraints and areas where residential development is not appropriate. In addition, the proposal provides an area of open space as part of the overall development. It is considered that this density is acceptable in this location. In addition, the NP policy is for the site to come forward as part of a comprehensive scheme. No change.
Henry Adams	WSCC	The draft allocation refers to the means of access being via Pound Lane, not Smugglers Lane. Smugglers Lane is an adopted road. It is conceded that the eastern section of Smugglers Lane is single track, however, prior to the track changing, there is room for 2 cars to pass. Any future proposals could allow for the significant widening of Smugglers Lane, which could include the provision of vehicular and pedestrian access to the southern side of the overall allocation site. It is our opinion that access to the proposed site should be formed via Smugglers Lane, as well as via Pound Lane.	The allocation in the NP is for a comprehensive scheme. WSCC as highway authority has raised no objection to the policy as drafted but has suggested that a single transport assessment is provided as part of the masterplan. However, recent communication (Nov/Dec 2018) between WSCC and Henry Adams has confirmed that in principle, there is no objection to access from Smugglers Lane. The NP policy and text has been updated to include reference to a secondary access from Smugglers Lane.

Henry Adams	WSCC	The current draft allocation sets out 8 criteria which must be adhered to, if proposing development at the site. Whilst the landowners support the principle of a masterplan, they would not support the principle of a single access into the site via Pound Lane (criterion 3). In reviewing the background evidence, it is clear that the provision of our client's site is key to ensure the overall allocation relates well to the existing settlement boundary. Accordingly, a means of access via Smugglers Lane will ensure both physical and visual connectivity between the site and existing settlement boundary. The landowner does not therefore support the requirement for a single access point onto the site, for the reasons set out above.	As mentioned above, the allocation is for a comprehensive scheme and therefore the site is considered as a whole. Please see response above re changes made to include a Smugglers Lane access point.
Henry Adams	WSCC	In terms of further criterion in the draft Policy 3, the first part of criterion (7) is considered unnecessary as this would be a validation requirement in any case.	This criterion within the policy has the support of the EA and is specifically referred to in their NP Reg 14 comments. It is important for the local community to know that matters relating to flood risk will be addressed. No change.
Henry Adams	WSCC	It is recommended the policy is amended to say: The Neighbourhood Plan supports a comprehensive development of the site as shown on the Policies Map for <del>around</del> <b>'at least'</b> 70 houses, in accordance with the following principles. These will be set out in detail in a Development Brief that will include a concept Masterplan Map. 1. The site is to deliver affordable homes in accordance with identified need. The proportion of sheltered housing should also be specified. 2. The layout of the development considers the setting of Pound House Cottage (Grade II listed building) to the west of the site with boundary	As noted above the text has been changed to include information on Reg 14 comments. No other change.

		<p>screening re-enforced further through additional planting as part of any development of the site.</p> <p>3. <del>Access is to be from Pound Lane.</del> Pedestrian and cycle links from the site to Upper Beeding village centre are to be provided.</p> <p>4. A full ecological and biodiversity survey of the site is required and to be submitted with the application.</p> <p>5. In order to provide a robust and defensible boundary to the development, a strong 'landscape buffer' to the site perimeter shall be provided, enhancing existing areas of vegetation where appropriate. Existing boundaries will be retained and enhanced with native species to ensure an appropriate and effective soft scape/green transition from urban to rural and help to minimise the visual impact of the expansion of Upper Beeding toward the National Park. A landscaping scheme must be submitted with any planning application.</p> <p>6. An area to the east of the site, currently lying within the Flood Zone 3, will be laid out as public open space and allocated as such.</p> <p>7. <del>A flood risk assessment will be required to support a planning application.</del> Any layout should follow the sequential approach to ensure the most vulnerable uses are placed in the lowest flood risk zone.</p> <p>8. All external lighting shall be designed and laid out to minimise light pollution and support the dark skies policy of the South Downs National Park.</p>	
Alison Giacomelli Sussex and Kent Area Team	Natural England	<p>Policy 3: Land east of Pound Lane, Upper Beeding</p> <p>This allocation site is close to the boundary of the South Downs National Park. Therefore, Natural England welcomes the requirement in Policy 3 that a landscape buffer should be provided. The size of</p>	<p>Thank you for your comments which are noted. The details of the recreational space will be agreed at the planning application stage and we would welcome input from NE at this point. No change.</p>

		the site offers significant opportunity to deliver biodiversity enhancements to benefit people and wildlife. We note that an area to the east of the site will be reserved as public open space. We recommend that this area is a multi-functional space delivering recreational and wildlife benefits.	
Charlotte Mayall Development Manager	Southern Water	<p>We have undertaken a preliminary assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for this proposal. This indicates that connection at the "practical point of connection" as defined in the New Connections Services implemented from 1st April 2018, could lead to an increased risk of flooding unless network reinforcement is undertaken.</p> <p>This reinforcement will be provided through the New Infrastructure charge (see our website: <a href="https://www.southernwater.co.uk/infrastructure-charges">https://www.southernwater.co.uk/infrastructure-charges</a> for more information), but Southern Water will need to work with site promoters to understand the development program and to review to ensure the delivery of network reinforcement aligns with the occupation of the development. This is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of sewerage infrastructure, in order to prevent the increased risk of flooding. Accordingly, we propose the following criterion (new text underlined) is added to Policy 3:</p> <p>...</p> <p><u>9. Occupation of the development is phased to align with the delivery of wastewater network reinforcement, in liaison with the service provider</u></p>	Thank you for your comments which are noted. It is considered that these matters – regarding phasing of development – are considered at the planning application stage when more technical details will be produced as part of developing the scheme and submitted with the application. No change.
Hannah Hyland	Environment Agency	<p>Policy 3 – Land East of Pound Lane, Upper Beeding</p> <p>We are pleased to see that the policy includes</p>	Thank you and noted.

		criteria to ensure no development in FZ3 and that the sequential approach should be applied on site.	
Elliott Newlyn	Rydon Homes	Rydon Homes fully support Policy 3 - Land East of Pound Lone, Upper Beeding. It would be our intention to work with the Upper Beeding Neighbourhood Plan group and at the appropriate time we would be happy to present our concept plans to the group and Upper Beeding residents.	Thank you and noted. Please note that this a comprehensive site and therefore the two landowners/promoters will need to work together. We would welcome any comments on the details within the policy.
Elliott Newlyn	Rydon Homes	We fully recognise that there is a need for new high quality affordable and private housing to be brought forward in Upper Beeding and support the findings in the AECOM study that has been prepared as part of the evidence base. However, we strongly believe that the need for housing on our site should be tempered with a sensitively designed constraint led housing scheme that considers the surrounding landscape impacts, ecology, highways, flood zones and listed building. It would be our intention to address all of these constraints as part of the on-going dialogue with the Neighbourhood Plan group.	Thank you and noted. Please note that this a comprehensive site and therefore the two landowners/promoters will need to work together. We would welcome any comments on the details within the policy.
South Downs National Park		Policy 3: Land east of Pound Land, Upper Beeding This is a large site allocation on countryside to the north of the village. The site is exposed in views from the South Downs National Park and the footpath along Windmill Hill as well as having important cultural heritage, landscape and biodiversity considerations. While the policy identifies that Pound House, listed at Grade II, lies to the west of the site, the farm within the site is part of a surviving early post-medieval landscape. For information we have identified from our records that part of the site closest to the settlement is on freely draining soils, part on clays	Thank you and noted. The supporting text has been amended. The policy has been amended to include more reference to a landscape-led approach although it is considered the suggested text is too detailed and lengthy to be provided within the actual policy. Key parts of the letter have been included within the supporting text and policy.

		with a high groundwater. The site also (partially) lies within the North Bramber Floodplain Biodiversity Opportunity Area.  <i>The letter from SDNPA contains some suggested text provided within response letter</i>	
West Sussex County Council		Policy 3 - It is fundamental that the three sites forming this allocation are considered cumulatively. The proposed masterplan covering these sites is supported. This should also extend to the provision of a single transport assessment.	Thank you and noted. The text has been amended to make reference to the single transport assessment.
<b>POLICY 4 – LAND AT SOUTHERN END OF OXCROFT FARM, SMALL DOLE</b>			
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	7.28 'There may, however, be a need for the existing farm buildings to be re-located elsewhere within the site as a result of the proposed new access'. <b><i>This will ensure that there is no 'net' loss of the employment use on this site.</i></b>	Thank you. Text has been amended.
On behalf of the Trustees of E.G. Collins i	DMH Stallard	We wholly support the proposed allocation of Land at the southern end of Oxcroft Farm as a site allocation in the Draft Neighbourhood Plan.	Thank you and noted.
On behalf of the Trustees of E.G. Collins	DMH Stallard	We note that it is for this reason that the proposed allocation is for a number of units which is at the lower end of the proposed range. Whilst we would agree that this is a sensible approach, we are concerned that there may be a possibility that the Henfield Neighbourhood Plan does not allocate any housing at Small Dole, and as such there may be an unmet need for housing in the village. With this in mind we query whether it would be sensible to put in place a mechanism whereby should this occur, a scheme at Oxcroft Farm which provides for more than 20 houses could come forward.	We have no indication that Henfield will not allocate sites within their Neighbourhood Plan and the two NP groups are working together to ensure there is a co-ordinated approach to allocations within Small Dole. The suggested yield allocated for Oxcroft Farm has been considered taking into account the settlement of Small Dole and its position within the settlement hierarchy within the Horsham Development Plan. In addition, the allocation of housing is to address an unmet need across the parish and not just in the village. It is considered at this stage that 20 units is appropriate for the site and settlement. Note that NP policy 2 states that the exact and final numbers of

			housing to be accommodated on each site will be confirmed once technical studies and surveys as set out in each individual site policy, are completed and approved by the relevant authorities. It also states that 'around 20' houses will be accommodated on the site.
On behalf of the Trustees of E.G. Collins	DMH Stallard	It is our view therefore that the affordable housing requirement referenced within the Draft Neighbourhood Plan should be considered a target, and there should be an acknowledgement within the Plan of this, and also that where viability is an issue, a lower level of affordable housing may be necessary and will be acceptable.	The NP does not set out an affordable housing requirement for any of the sites but refers to affordable housing being provided in accordance with need. This is considered to be a flexible approach. In addition, the NP must be in conformity with the Development Plan for the area. There is no evidence that indicates the UB NP should deviate from the policy position of the HDPF nor is there a need to repeat Policy 16 within the NP. Therefore, affordable housing numbers within the NP will be considered in light of the provisions set out in Policy 16 taking into account local need.
On behalf of the Trustees of E.G. Collins	DMH Stallard	Policy 4 requires that any development provides an access from the Henfield Road (A3207) and the exact position is to be agreed with West Sussex County Council. The Trustees agree that the access to the site should be from Henfield Road. The site is currently accessed from Henfield Road via a small junction which also serves as an access to other properties north of the site. A Highway Access Report has been undertaken for this site and submitted as part of the Neighbourhood Plan 'call for sites' exercise. This report confirms that overall, an acceptable access can be achieved and there are no highway or transport impacts as	Thank you and noted. WSCC as highway authority, have raised no objection in their comments on the Reg 14 NP. The reference for the point of access to be agreed with WSCC has been deleted.

		a result of the proposals. It should be noted the report advises that preapplication consultation has been undertaken with WSCC to obtain their preliminary views, and that they have given advice on which of the 3 access points would be preferable.	
On behalf of the Trustees of E.G. Collins	DMH Stallard	The policy requires that a full ecological and biodiversity written survey of the site be submitted as part of a formal planning application. It is acknowledged that development of the site could require the removal of part of the hedgerow on site to facilitate access to the site. If this is required then it should be noted that as part of the planning application, national and local planning validation requirements would specify that a biodiversity report is undertaken for the site and submitted with the planning application. As the need for a biodiversity report is covered under local and national validation requirements, we would query whether this requirement needs to be set out within Policy 4.	Whilst this issue may be covered as part of the validation process of a planning application, it is considered important that the matter is also raised within the overarching policy for the site in order to provide certainty to the applicant and to the local community. We consider that such reports should inform the design and overall development rather than it being a study that seeks to justify the ideas of the landowner/applicant. No change.
On behalf of the Trustees of E.G. Collins	DMH Stallard	This part of the policy requires a landscaping scheme be submitted with a planning application. However, it should be noted that the local validation requirements for planning applications set out that all applications for major development (i.e. 10 houses or more) would require a landscape assessment, strategy and details to be submitted in support of any planning application. As such it is our view that point 4 of policy 4 is unnecessary as this requirement will be met through local validation of the planning application.	Please see comments below.
On behalf of the Trustees of E.G. Collins	DMH Stallard	The policy requires that a strong 'landscape buffer' be provided to provide a robust, defensible boundary to the development, with consideration	Thank you and noted. We agree that both points 4 and 5 are duplicates and have combined them into one point. Matters

		<p>for views of the National Park and Horton Clay SSSI. It also states that where possible existing boundaries should be retained and enhanced with native species. It is our view that points 4 and 5 of policy 4 are duplications, and therefore both requirements are not necessary as criteria for the policy. It is considered that requiring the submission a landscaping scheme and a strong landscape buffer on site is both unnecessarily repetitious and prescriptive. We would suggest therefore that point 4 be deleted. Whilst the development will where possible retain existing boundaries, it should be acknowledged that requirement 2 of this policy could result in a conflict with this objective. Requirement 2 specifies that access is to be taken from Henfield Road, and depending on the position and visibility requirements of this access there will be a need to remove some of the existing boundary treatment along this section of the site.</p>	<p>relating to which part of the boundary treatment/hedges will be removed to create the access will be dealt with as part of the various studies and technical required for the application and considered at that point. This does not justify removing these parts of the criteria from the policy.</p>
<p>On behalf of the Trustees of E.G. Collins</p>	<p>DMH Stallard</p>	<p>The policy requires that the development be designed so not to unacceptably harm the amenity and privacy of occupiers of properties along Henfield Road. We agree that this is an important requirement for any development on site, and any scheme put forward on site would make best endeavours to ensure that the amenities and privacy of existing and proposed residents would be protected. However, we do query whether this criterion of the policy is necessary given that this is something that would be duly considered and given significant weight by the case officer as part of their assessment of the planning application.</p>	<p>The policy seeks to ensure that the amenities of local residents are considered as part of developing an appropriate scheme for the site. The impact of development on the local communities is significantly important for neighbourhood plans and this criterion ensure that this issue is an important consideration right from the start. No change.</p>
<p>On behalf of the Trustees of E.G. Collins</p>	<p>DMH Stallard</p>	<p>This part of the policy requires that the pond within the site be retained and incorporated within the</p>	<p>This issue is of important to the local community for ecological and historical</p>

		<p>scheme. Whilst there is no objection in principle from the Trustees to this requirement, it would be helpful to have clarification as to why this requirement is considered necessary.</p>	<p>reasons. Assessment document for the site completed by NP steering group shows a plan of the site with the pond retained. Policy is to ensure this is followed through. No change</p>
<p>On behalf of the Trustees of E.G. Collins</p>	<p>DMH Stallard</p>	<p>This part of the policy states that improvements to the pedestrian access connecting the site to existing bus stops will need to be provided as part of the overall development. It is therefore suggested that this requirement be removed from the policy. We consider that a far more effective and suitable alternative would be to ensure that the site could be linked effectively to the bus stops to the north, which are more user friendly and marked. It should also be note however that this requirement relates to an area which is outside of the boundary of the site allocation and strictly speaking is therefore outside the remits of the requirements of this allocation policy. The improvements to link to the bus stops to the south would require development over WSCC highway land and this could be difficult to arrange and secure. We are concerned that the need for the requirement to improve pedestrian access by connecting the site to existing bus stops would be beyond the scope and control of the landowner, and therefore, may make the development undeliverable.</p>	<p>The policy does not state which bus stop the site should be connected to so unsure why reference is made in the comments to a preference for the northern bus stops. The Highway Access Report February 2016 for DMH sates in paragraph 2.5 - <i>there is likely to be a need to develop a new footway or better bus stop facilities as part of any development of the site.</i></p> <p>It is therefore considered that in terms of promoting sustainable development that any development of the site includes improvements to accessing public transport for future residents of the development.</p> <p>The wording has been slightly amended to this part of the policy.</p>
<p>On behalf of the Trustees of E.G. Collins i</p>	<p>DMH Stallard</p>	<p>This section of the policy states that a land contamination study of the site is required with a planning application. The site is currently used for agricultural purposes and as such it is unclear whether a contamination study would be necessary for the site. As a result, it is considered that this requirement should not be referred to</p>	<p>Thank you and noted. The wording has been slightly amended.</p>

		<p>within the policy, it may be onerous if it is determined that a contamination study would not be required for any subsequent planning application on the site. It should also be noted that this requirement is included within the local validation list, this states that a Land Contamination Assessment will be needed where contamination is known or suspected or the development is in the vicinity of such land, a desk study shall be required to determine the likelihood of contamination. As such it is our view that point 9 of policy 4 is unnecessary as this requirement will be met through local validation of the planning application by Horsham District Council.</p>	
<p>On behalf of the Trustees of E.G. Collins i</p>	<p>DMH Stallard</p>	<p>The site allocation is subject to a number of requirements as set out within the site allocation policy, which we believe may have an impact on the ability of the site to provide the quantum of development proposed. we believe that it is now necessary for us to review the above requirements against the constraints of the site, and provide a draft site layout to the Steering Group. It should be noted however, that this exercise may highlight that in order to provide the desired quantum of development and the policy requirements the site allocation may need to be slightly larger than currently proposed. As such we consider that it may be suitable for the Steering Group to consider allowing the site allocation boundary to be flexible in order to allow for a slight expansion if the draft layout demonstrates this is necessary. We would be very happy to discuss this matter further with the Neighbourhood Plan Steering Group.</p>	<p>Thank you and noted. No change to the NP policy but would welcome the opportunity to discuss a draft site layout.</p>
<p>On behalf of the Trustees of E.G. Collins i</p>	<p>DMH Stallard</p>	<p>The wording of some elements of the policy, in particular those which require that development only be permitted where it meets all listed criteria is</p>	<p>Thank you and noted. Changes have been made to the wording in line with the above comments. However, the policy does not</p>

		not positively prepared as it seeks to place burden on the development proposal. It is our view that consideration should be given to these elements and if required these should be removed from the policy	state that development will not be permitted unless it meets the listed criteria. The policy states that certain matters will need to be addressed.
Charlotte Mayall Development Manager	Southern Water	Accordingly, we propose the following criterion (new text underlined) is added to Policy 4: Any development will need to address the following: ... <u>10. Occupation of the development is phased to align with the delivery of wastewater network reinforcement, in liaison with the service provider</u>	Thank you for your comments which are noted. It is considered that these matters – regarding phasing of development – are considered at the planning application stage when more technical details will be produced as part of developing the scheme and submitted with the application. No change.
West Sussex County Council		Policy 4 - The proposal to create a new vehicular access is supported.	Thank you and noted.
<b>POLICY 5 – LAND AT GREENFIELDS, HENFIELD ROAD, UPPER BEEDING</b>			
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	'Policy 5. 4. A landscaping scheme is to be submitted with the planning application. Any development will need to consider the landscape impacts on the South Downs National Park'.	Noted and changes made to the text.
Alison Giacomelli Sussex and Kent Area Team	Natural England	Policy 5 – Land at Greenfields, Henfield Road, Upper Beeding This site is immediately adjacent to the South Downs National Park. Careful design of housing coming forward will be necessary, to avoid visual impact on the setting of the National Park.	Thank you and noted.
Hannah Hyland	Environment Agency	Policy 5 – Land at Greenfields, Henfield, Upper Beeding. We support the requirement that a Flood Risk Assessment should be produced to support this development. We would also recommend that the policy specifies that no built (residential) development take place in the area of FZ2/3 as detailed in the supporting text.	Thank you. Policy text has been changed.

South Downs National Park		<p>Policy 5 – Land at Greenfields, Henfield Road, Upper Beeding  This site is located adjacent to the boundary of the National Park therefore visibility and views from the SDNP should inform the earliest stages of design. Heights of buildings and roofscapes will be a significant aspect of this assessment as well as providing an appropriate boundary transition and buffer with the National Park.</p> <p><i>The letter from SDNPA contains some suggested text provided within response letter.</i></p>	Thank you. The policy and supporting text have been updated.
West Sussex County Council		<p>Policy 5 Any development of this site should be supported by a comprehensive Flood Risk Assessment that in particular considers the flow route for surface water run-off originating from higher ground to the east, in particular Beeding Hill and to a lesser extent Windmill Hill, that routes immediately to the south of the proposed development (see Figure 1). In addition, the Flood Risk Assessment ought to consider the in-combination effect of tide-locked outfalls and a 1:100 (plus climate change) storm event for the site.</p>	Thank you and noted. This information has been inserted into the supporting text.
<b>POLICY 6 - RIVERSIDE CARAVAN PARK, UPPER BEEDING</b>			
Hannah Hyland	Environment Agency	<p>Policy 6 – Riverside Caravan Park, Upper Beeding  This site falls wholly within Flood Zone 3 and as such without full justification we have concerns regarding its allocation, particularly for sheltered housing where residents will be more vulnerable.</p> <p>Provided that the LPA is satisfied that the Sequential Test has been passed it is important that the policy provides sufficient criteria to ensure that the exception test will be met given. It is important that your Plan also considers whether the flood risk</p>	Following a further exchange of correspondence between the EA and Horsham DC (Nov/Dec 2018), further changes have been made to the supporting text and policy taking on board advice from the EA.

		issues associated with these sites can be safely managed to ensure development can come forward. Without this understanding we are unsure how your Plan can demonstrate compliance with the NPPF.	
West Sussex County Council		Policy 6 This policy relates to a site in Flood Zone 2 adjacent to the Adur. The Environment Agency has previously objected to this on grounds of fluvial flood risk. The underlying geology is shown as being Terrace river deposits of sand and gravel that renders such a low lying site adjacent to the River prone to groundwater flooding in addition to the fluvial flood risk Figure 2b shows the site to be in an area at high risk from groundwater flooding (red). It also will receive surface water run-off from the higher ground to the east (Windmill Hill). This combination, together with fluvial defences, renders the site very difficult to drain effectively under certain environmental conditions (persistent high / saturated groundwater) persistent rainfall and tide locking). If this site is to be allocated, this needs to be on an agreed basis with the Environment Agency and the Lead Local Flood Authority.	Thank you. Following a further exchange of correspondence between the EA and Horsham DC (Nov/Dec 2018), further changes have been made to the supporting text and policy taking on board advice from the EA.
West Sussex County Council		Policy 6 - The width of Riverside is very narrow. The increase in traffic would need to be demonstrated as part of any formal planning application and suitable improvements can be implemented to overcome any issues raised.	Thank you. The policy text has been updated.
<b>POLICY 7 LAND AT VALERIE MANOR, HENFIELD ROAD, UPPER BEEDING</b>			
Alison Giacomelli Sussex and Kent Area Team	Natural England	Policy 7 – New Development to Provide Further Care Home Provision at Valerie Manor, Henfield Road, Upper Beeding This site is within the National Park. We note that the policy includes a clause that development	Thank you. The policy text and supporting text has been updated.

		should not adversely affect the landscape character of the South Downs National Park. Natural England recommends amending this to add that there should also be no visual impact on the National Park.	
South Downs National Park		<p>Policy 7 – New Development to provide further Care Home provision at Valerie manor, Henfield Road, Upper Beeding</p> <p>The site where the proposed further Care Home facilities are to be provided is clearly visible in views from the South Downs Way running to and from Beeding Hill. While we appreciate that new development will be seen in the context of existing built form, the site is highly sensitive due to its visibility from the SDNP and its nationally important trail and as a result of cultural heritage considerations i.e. Valerie Manor; listed at Grade II and likely associated with New House farm – a 19th Century farmstead, present on the Tithe Map and that the site is within the setting of the conservation area).</p> <p><i>The letter from SDNPA contains some suggested text provided within response letter.</i></p>	Thank you. The policy text and supporting text has been updated. However, suggested text is too detailed and lengthy to be provided in full within the actual policy.
West Sussex County Council		<p>Policy 7 The site is shown as being on slightly higher ground with a reasonable ~1:14 gradient from the road towards the stream. Providing the southern portion of the site is excluded from development, the policy should be sufficient on flooding grounds. The Flood Risk Assessment should take into consideration the high risk of groundwater flooding shown in Figure 3b.</p>	Thank you. The policy text and supporting text has been updated.
<b>POLICY 8 DESIGN STANDARDS FOR NEW DEVELOPMENT</b>			
South Downs National Park		Policy 8 –Design Standards for New Development; second sentence	Thank you. The text has been amended.

		The second sentence of this policy only refers to areas adjoining the National Park and therefore does not cover any development proposals that will come forward within the National Park. The text also needs some editing to reflect the wording in the SDLP	
<b>POLICY 9 – COMMUNITY FACILITIES</b>			
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	It is recommended Policy 9 be converted to a Community Aim. It is suggested Infrastructure requirements outlined in Policy 9 are set out in an Infrastructure Delivery Plan (IDP) stipulating the community's infrastructure needs over the plan period. The IDP will be key document to justify any future CIL spending derived from development receipts generated within the Parish.	Community facilities, both new and existing are important to local residents. It is likely they would wish for this policy to be retained as such. No change.
<b>POLICY 10 – EMPLOYMENT SITES AND SUPPORTING BUSINESSES</b>			
On behalf of Hopegar Properties	DMH Stallard	We wholly support the contents of policy 10 in the Draft Neighbourhood Plan and fully support the Council's view that the Mackleys site should be noted within policy 10 as it is our view that this site provides a significant employment offer in the Parish. However, there are a couple of important points that we would like to bring to the attention of the Steering Group.	Thank you and noted.
On behalf of Hopegar Properties	DMH Stallard	Built-Up-Area Boundary It is our view that there are some inconsistencies with regards to the Built-Up-Area Boundary which need to be corrected. The Context Plan at Appendix A (Page 88) of the Draft Neighbourhood Plan indicates the Built-Up-Area boundary as shown within the area coloured in grey below (map contained within letter) However, it is important to note that the Plan entitled "Map 2: Extent of Built Up Area of Small Dole" which is shown on page 17 of the Draft Upper Beeding Neighbourhood Plan document and is also	Plans have been updated.

		<p>included within the Maps of UB Parish pack does not reflect the same boundary. This plan is shown below and it can be seen that the full extent of the southern boundary of the Built Up Area of Small Dole, and consequently the southern portion of the Mackleys Estate, is not included within this plan. It is our view that this plan needs to be updated to refer to the correct BUA Boundary by including the currently omitted southern section of the Built-Up-Area of Small Dole and the whole of the Mackleys Estate. To not rectify this may result in confusion as to how the Built-Up-Area policies and Employment policies within the Draft Neighbourhood Plan can be applied in practice.</p>	
<p>On behalf of Hopegar Properties</p>	<p>DMH Stallard</p>	<p>Policy 10 states that “Existing business parks/industrial areas will be protected from change of use or redevelopment. These are shown on the Policies Map”. The Small Dole policies map shows the extent of policy 10 in relation to the Mackleys Estate, it can be seen from the extract of the plan below that the policy does not cover the whole of the site. The site outlined in yellow does not include two of the existing industrial estate units on the site, and in addition it does not include the area of storage on the southern tip of the site. It is unclear as to why these parts of the site have not been included within the boundary of policy 10 on the policies map. These parts of the site have been in use in connection with the wider estate and have been for a considerable amount of time. We consider that the boundary of policy 10 in relation to Mackleys Estate needs to be amended to include the whole of the Estate, to not do so would result in these parts of the Estate not being afforded the same protection in relation</p>	<p>Plans have been updated.</p>

		to employments uses as the remainder of the site.	
On behalf of Hopegar Properties	DMH Stallard	<p>An aerial view of the site is shown below. The area outlined in yellow on the map below is not included within the boundary of policy 10 on the policies map, however, the aerial image below clearly shows that this area is occupied by 2no. large linear industrial buildings. It should be noted that in total there are approximately 9 separate units within these 2no. industrial buildings. These units form an integral part of the existing Estate, they are occupied and have been in use for a considerable amount of time (planning permission was granted for these in 1994). It is therefore respectfully requested that this area of the site be included within the policies map. With regards to the southernmost part of the Mackleys Estate, (the area outlined in red below) this is an open storage area which is an integral part of the existing Estate. It is used for an open storage use (B8) in connection with the JT Mackleys business and wider Industrial Estate, it has been used as such for some time, and it has planning permission for such uses (application reference: UB/28/95). Furthermore, this open storage area is already included within the existing built-up-area boundary of the settlement of Small Dole, therefore the inclusion of this parcel of land would correspond with the existing built-up-area boundary of Small Dole, and it would not involve the loss of any land designated as a countryside area.</p>	Plans have been updated.
On behalf of Hopegar Properties	DMH Stallard	<p>We note that policy 10 supports two of the objectives of the Neighbourhood Plan, one of which (objective 4) is to secure the future of the existing employment uses within the parish and plan for their growth to serve and support the local economy. We are aware from the Local Economy</p>	Plans have been updated.

		Focus Group Report that one of the objectives of the group is to “Improve the local economy by improving & introducing new opportunities for businesses to grow & prosper, allowing significant local benefit from economic growth”. It was noted in the same report that existing industrial areas in the Parish do have some future growth potential, although it was noted that most estates have developed to their capacity and new opportunities are either exhausted or extremely limited. It should be noted that by including the area of the south of the Mackleys Industrial Estate would enable an area approximately 1.1 hectares of land which could be made available for employment space, and this will help make a significant contribution to the continued need for commercial space in the Parish and the District.	
South Downs National Park		Policy 10 –Employment Sites and Supporting Businesses Some of the employment sites referenced in the policy are located within the SDNP. This policy therefore needs to reflect the wording of the employment policies in the SDLP as it may have the potential to conflict with these otherwise	Thank you. Text has been updated. The length of time suggested for a marketing campaign is not considered necessary to include within the text of the policy.
<b>POLICY 11 LOCAL GREEN SPACES</b>			
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	Revised NPPF: Paragraph 77 100	This section has been updated.
Emma Grundy Asset Manager	Horsham District	Horsham District Council owns the land at Priory Field, Upper Beeding. We have not been consulted regarding designating our land as a Local Green Space and we object to the allocation of all of this area as a LGS. See plan attached and aerial photograph. Horsham District Council would support the allocation of some of its land but not all as a LGS. We own the land edged	It is very unfortunate that the steering group did not make contact with HDC with regards to the proposed LGS as they did with the landowners of the proposed LGS sites. At the time, there was confusion as to whether the land was owned by WSCC. However, the steering group has considered the comments from WSCC and agree to amend

		in red but would like to take out the land edged in blue as this could be developed for housing. Horsham District Council would not object to the remaining area within the red edging being designated as a Local Green space.	the LGS allocation in line with the map and information supplied.
Alison Giacomelli Sussex and Kent Area Team	Natural England	Policy 11 – Local Green Spaces Natural England supports the inclusion of a policy on Local Green Spaces.	Thank you and noted.
Charlotte Mayall Development Manager	Southern Water	Southern Water understands Upper Beeding Parish Council's intention to protect Local Green Spaces. However, we cannot support the current wording of policy 11, as it could create barriers to statutory utility providers, such as Southern Water, delivering essential infrastructure required to serve existing and planned development allocated in the District or Neighbourhood Plan. Accordingly, we propose the following additional text to Policy 11 (new text underlined): No new development shall take place on the areas designated as Local Green Space other than in very special circumstances such as: [...] <u>(iii) The provision of essential utility infrastructure, where the benefit outweighs any harm or loss and it can be demonstrated there are no reasonable alternative sites available</u>	Thank you and noted. The text has been updated.
<b>Chapter 8 – Non-Statutory Community Aspirations General</b>			
South Downs National Park		It would be useful to reference in this section that the Parish Council can use its portion of Community Infrastructure Levy (CIL) monies to help deliver projects. In addition, it might be helpful if the community aspirations 2, 3 and 5 (on pages 81 – 84 and set out in Appendix F) were listed in order of priority for CIL spending. This would help both us and Horsham in our infrastructure planning (i.e. identifying the most important projects for funding	Reference is made in para 8.1 to CIL. At this stage, the steering group do not find it necessary to list the aspirations in order. No change.

from both the SDNPA's and Horsham's CIL pot).

**Community Aspiration 1 - Shoreham Cement Works**

**Community Aspiration 2 – Road, Access and Public Transport**

South Downs National Park

We have highlighted above that the Objectives and Spatial Strategy sections should refer to improving connections to the South Downs Way and the South Downs Link. Projects to address the following issues would be welcomed and supported. These issues include:  
From Upper Beeding the most direct route to South Downs Way would be from the small roundabout in the village, along the A2037 down to the A283 larger roundabout and then along a path from the car park next to the very busy A283 Road. However, the route just described is only suitable for road cyclists as the roadside verges are incomplete and one cannot walk along the whole length of the road. The path from the car park at the AA83 roundabout is also inadequate. Without improvements to the A2037, the alternative connection to the South Downs Way is via Castle Town and the Monarchs Way long distance path. Improvements would enable more circular routes from the settlements into the countryside. Further south, WSCC in liaison with SDNPA is looking at an improved design where the South Downs Way crosses the A283. The new path would accommodate horses more safely than the existing provision but the issue remains that the traffic speeds and volumes are very high which impacts on user enjoyment and perceptions of safety. The Community aspirations section in the plan should also reference equestrians as they are key users of the South Downs Way. From St Marys House, Bramber, an easy access trail has been created which connects with an improved

Thank you and noted. The suggestions are perhaps too detailed/lengthy to be included within the aspirations. In addition, some references relate to land within Bramber Parish and outside the UBNP area. However, the aspiration has been amended to include further details.

		riverside public footpath. This in turn connects with a relatively new Downs Link underpass which means that users of the Downs Link path do not have to cross the A283. The public footpath on the river bank is suitable for cyclists but they are not permitted to use it (although they do). An upgrade of this path to allow cyclists would be welcome. The public footpath along the river connects to the High Street at the bridge but the connection does not provide access for all as steps are involved and the width is narrow with access directly onto the road. Improvements to this would also be welcomed.	
<b>Community Aspiration 3 – Community and Social Infrastructure</b>			
<b>Community Aspiration 4 - Retail/tourism/regeneration</b>			
<b>Community Aspiration 5 - Broadband</b>			
<b>Appendices</b>			
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	Policy Maps: Small Dole Policy revC Sites 6, 18 and especially 19 are difficult to see. All sites proposed for allocation will need their own site map in order to define boundaries and full conformity with the basic conditions.	Maps have been updated.
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	Policy Maps: Context plan revC. This is a helpful map. However, some designations such as Scheduled Ancient Monument, Site of Archaeological Importance are more difficult to see and an inset map of the built forms of Upper Beeding and Small Dole would help to show these smaller constraints in more detail.	Maps have been updated
Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	Policy Maps: Upper Beeding Sites All sites proposed for allocation will need their own site map in order to define boundaries and full conformity with the basic conditions.	Maps have been updated. Individual maps have not been provided but boundaries are now clear.

Gavin Curwen Neighbourhood Planning Officer	Horsham District Council	Policy Maps: Upper Beeding Policy revC A map showing the precise locations of each Local Green Space would be helpful.	Maps have been updated. Individual maps have not been provided but boundaries are now clear.
West Sussex County Council		<p>The Lead Local Flood Authority (LLFA) has a statutory responsibility for the management of local flood risk, i.e. flooding from surface water, groundwater and ordinary watercourses. However, these risks do not necessarily operate in isolation and the comments below place local flood risk in the context of wider flood risks including flooding from Main River. It is considered that it would be helpful, and recommended by the LLFA, that the Site Maps in the Neighbourhood Plan include the fluvial flood zones.</p> <p>While the spatial strategy in paragraph 6.1 acknowledges “The surface water and fluvial flood risk that the parish suffers from and which impacts significantly on residents”, this does not appear to have been considered adequately in the site selection process.</p>	<p>It is considered the flood zones would override the details required to be shown on the Policies Maps. No change.</p> <p>Site assessment work has been undertaken by AECOM. Further comments from WSCC on sites are welcomed. A ST has been undertaken.</p>
West Sussex County Council		Appendix F. The various community aspirations are noted. The Parish can pursue these, including through the Community Highway Schemes initiative. Footnote 46 states that “The funding is provisional at this stage. Further work will be needed to identify sources of funding and the cost of each project.” This should be made clearer to the reader, it is suggested this is a note above the table. This is in order to make it clear to the reader that the list of projects they are about to read are not approved and planned to come forward, but a list compiled from feedback at the neighbourhood plan consultation exercise and responses to specific consultations. The ‘Lead	Thank you and noted. Text changes have been made and additions made to the community aspiration.

		<p>Body' title should be changed to 'Possible Lead Body' this also highlights that these are not necessarily approved projects and the development lead may also be different if they were taken forward.</p> <p>It is welcomed that foot and cycle access is recognised as valuable for the future community by the desire to improve footpaths and bridleways in Appendix F. The Upper Beeding Environment and Countryside Focus Team document of 2016 identified a number of routes worthy of potential creation/ improvement, including a link to Steyning, but has not been included in the Draft Plan. It is suggested that consideration be given to whether an off-road route connecting Upper Beeding and Steyning would be valuable and, if so, include this in the schemes on p111.</p> <p>Waste and Minerals Local Plan references on page 90 should be updated. The West Sussex Waste Local Plan was adopted in 2014, the Joint Minerals Local Plan 2018.</p>	
<b>OTHER COMMENTS</b>			
Charlotte Mayall Development Manager	Southern Water	<p>Although there are no current plans, over the life of the Neighbourhood Plan, it may be that we will need to provide new or improved infrastructure either to serve new development and/or to meet stricter environmental standards. It is important to have policy provision in the Neighbourhood Plan which seeks to ensure that the necessary infrastructure is in place to meet these requirements. We could find no policies to support the general (ie non-site specific) provision of new or improved infrastructure.</p> <p><u>Proposed amendment</u> To ensure consistency with the NPPF and facilitate</p>	NP do not need to repeat policies that exist elsewhere in national and local planning policies. It is not considered this policy is specific enough to the parish of upper Beeding to be included within the NP. No change.

		<p>sustainable development, we propose an additional policy as follows: New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan</p>	
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