



Clapham
Neighbourhood
Development Plan

Clapham Neighbourhood Development Plan 2015-2035

Consultation Statement



Published July 2015

1. Introduction

- 1.1 This consultation statement has been prepared to meet the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Clapham Neighbourhood Development Plan (the Plan).
- 1.2 The legal basis of the Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:
 1. Contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 2. Explain how they were consulted;
 3. Summarise the main issues and concerns raised by the persons consulted; and
 4. Describe how those issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan

2. Background

The Plan process, led by the Parish Council, was launched in July 2014; the Parish Council decided that they wanted the local community to have a say in all aspects of the future of the Parish, and set up a working group consisting of Councillors and lay members. In late July a notice was distributed to every household explaining what was happening, and inviting volunteers to help. In August, a poster was put up announcing that there would be a display at the Summer Show on 6th September, at which people's ideas and concerns were collected (see Evidence Base for Terms of Reference).

3. Surveys

The priorities identified at the Summer Show helped to shape the Survey which was announced (via posters) in October 2014, and distributed to every household later in the month. Separate versions were distributed for children and for local businesses. Anonymity was respected for all responses. Full details of the responses can be found in the Evidence Base. Headlines from the surveys were as follows:

Main residents survey

Environment and Sustainability

Key issues

- Maintaining and enhancing the rural nature and identity of the village
- Protection for green spaces
- Pedestrian safety
- Conservation of heritage features
- Village community

- Provision of off-street parking and tidying verges rated as the biggest improvements that could be made

Getting Around

Key Issues

- 92.68% of residents do not use the bus service citing inconvenient bus times as the reason.
- Traffic calming and off-road parking measures were supported.
- Concerns raised about maintenance of footpaths and footways.

Business and Tourism

Key Issues

10 residents would like to start the own business in the area citing lack of funding and parking as issues.

Almost half of respondents felt that the Parish has a role to play in tourism. Suggestions included providing toilets; better parking; improved signage; marketing and improved footpaths.

Community Facilities and Wellbeing

Key Issues

- Maintaining shared services with Patching Parish
- Improved facilities for older and disabled people
- Improved play and other facilities for children and young people
- Improved broadband access

Housing and Design

Key Issues

- Preservation of local character, buildings and features
- Maintaining gaps between our village and other settlements
- Enforcing design standards
- Building should be on brownfield sites
- Size should be in keeping with surroundings
- Open space and gardens should be included

- Style and materials should be in keeping
- Off street parking should be provided
- There should be safe access onto The Street/Clapham Common

Housing Needs

There are 10 adults living in properties who need, but currently cannot obtain, their own home in Clapham parish.

There are 11 people who don't currently need their own home but who are likely to want one in Clapham parish in the next five years. They would like one to buy and own or to rent. Two bedroomed was most popular.

There are 12 people who are likely to need more manageable or sheltered accommodation in the next five years. The majority would like a bungalow.

Environment and Sustainability

Key Issues

- Protection of green spaces
- New play equipment for children
- Bigger café/shop
- Concerns about cyclists and motorbikes
- Support for most forms of renewable energy

Children's Survey

Key Issues

- Only one respondent went to the village school
- Most are taken to school by car
- Most use the shop/café
- All but one feels safe walking in the village
- Most feel that new play equipment is needed
- Most would use the play equipment if it was moved to the Village Hall site
- Most do not use the former BMX site

Business Survey

Key Issues

- All travel to work by car
- All use the shop
- All cited broadband speed and phone reception as issues
- All plan to increase their workforce in the next two years

4. Engagement

Throughout the development of the Plan the community has been kept informed through the Parish Council website, the regular Parish Council newsletter and items in the Parish Magazine and other local press. A drop-in event was held on 19th January to present the survey findings and to collect further feedback. An update presentation was given at the Annual Parish Meeting on 26th March. A further drop-in meeting was held on 19th June, and a display to inform people about the current status of the Plan and the upcoming Referendum will be mounted at the Summer Show on 22nd August. If required, a third drop-in meeting will be held on 16th October (See Evidence Base for full details).

5. Regulation 14 Consultation

On the 21st May 2015 the Plan was submitted to SDNP for consultation under Regulation 14. The following organisations were consulted by email:

South Downs National Park Authority
West Sussex County Council
Arun District Council
Natural England
The Environment Agency
English Heritage
The Highways Agency
NHS Coastal West Sussex CCG
Southern Electric
British Gas
Southern Water
Sussex Police

Clapham Parish Council
Patching Parish Council
Findon Parish Council
Angmering Parish Council
Worthing District Council

Village Church, Clubs and Societies
Parish Businesses

All residents of the Parish via the Parish Council web site.

6. Regulation 14 responses

Respondent	Policy Reference	Comment	Response
Patching NDP	3.6.1	<p>The section does not present a balanced nor current assessment of the School, its value and contribution to the Parishes of both Clapham and Patching. Specifically:</p> <ul style="list-style-type: none"> · The latest Ofsted report ranks the Overall effectiveness as Good. The Ofsted School Data Dashboard evidences continued improvement in performance year on year. · Whilst many of the pupils do not reside in the Parish, it is the case that many (most) of the children of relevant age in Patching and Clapham attend the school. · The school serves, and pupils attend from, the communities of Clapham, Patching and Findon · Consultation with Patching parishioners evidences overwhelming support for the School and consider it to be a valued village asset <p>The section should be amended to incorporate and reflect the current situation, as evidenced</p>	<p>The Plan does not propose the closure of the school merely provides for an alternative use should this happen. Happy to add details about Ofsted.</p>
Patching NDP	3.6.5	<p>In respect of Clapham and Patching Village Hall the statement “The facilities are small to medium and are frequently fully booked and thus unavailable to villagers” should be evidenced, so as to materially support policies relating to recreation facilities.</p>	<p>Available information obtained from Village Hall Bookings Secretary; comment modified accordingly</p>
Community Shop Project	4.1	<p>What does the comment - or very near by - mean</p>	<p>Within or adjacent to the parish boundaries. Text to be made more specific.</p>

Respondent	Policy Reference	Comment	Response
SDNP	BT1	See emerging SDNP Local Plan policy SD28: Employment Land. It may be that this policy is unnecessary given the emerging SDNP Local Plan policy. The policy could be clarified by the identification of the employment sites on a map if this is feasible.	Add map
Alan & Tricia Perrett	BT3	We would like to see clarification as to what is envisaged by 'retail units' in the context of this policy, e.g. in terms of size. We would not like to see large retail units in the area.	The policy makes it clear that the impact on the surrounding residential properties would be the primary consideration in determining acceptability.
Travis Perkins	BT3	See letter	Contact TP agent to explain that the site for development is their site
SDNP	BT3	The sites referred to would benefit from a reference number. The policy as written which allows for the use of one or the other piece of land does not 'provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency' (NPPF para 17) and is therefore not fit for purpose.	Agreed
Alan & Tricia Perrett	BT4	We support the presence in Clapham of a shop/cafe which is a valuable community facility. However, we are concerned that the wording of allowing 'any change of use of the village shop/ cafe.....will be supported....' could in fact result in it's loss to an alternative use that does not support the community in the same way.	The policy makes it clear that it will only be supported provided that it can be clearly demonstrated that any such proposal both satisfies an identified community need and demonstrates a tangible community benefit.

Respondent	Policy Reference	Comment	Response
Peter & Sian Smith	BT4	<p>Thank you all for producing a clear and comprehensive document. It has obviously taken much time and effort.</p> <p>Our only concern is about the possible loss of open land in front of The Junction. I believe the proposal is to enlarge the existing site of the shop and café, to create parking spaces for ten cars and vehicle access to the car park. This will have a substantial impact on the amount of open space remaining for recreation. We use this area daily, for exercising the dog, and playing games with young family relatives. Whilst we are using the green space, there are usually other residents using the land for similar activities</p>	Protected as Local Green Space
SDNP	BT4	<p>The policy seems to imply that the change of use of the shop would be supported. Is this the intended outcome? There is an identified need for homes in the village, would this meet the requirements of the policy and therefore result in the loss of the shop? If the shop is such a key asset it would be more appropriate to start the policy with, 'Loss of the village shop will not be supported, however any proposals to extend....'. and so on.</p> <p>Please also see emerging SDNP Local Plan policy SD50: Shops outside centres.</p>	Change wording to read - Loss of the village shop/café will be resisted. Proposals to extend, improve or relocate the facility, will be supported provided that it can be clearly demonstrated that any such proposal both satisfies an identified community need and demonstrates a tangible community benefit.
Community Shop Project	BT4	We appreciate the clear support that will be required to progress the improvement of the present facility.	

Respondent	Policy Reference	Comment	Response
Community Shop Project	BT5	The cafe/shop is suffering from a lack of adequate signage, what is classed as clutter? Who enforces this?	Signage clutter is a recognised term. The Dept. for Transport issued an advisory leaflet in January 2013 recognising that over-provision of signs can have a detrimental impact on the environment. This policy seeks to ensure that if an application to improve signage within the village is made it will be supported. The Parish Council will also seek opportunities to work with WSCC to do the same.
ADC	BT5	What is the definition of signage 'clutter'? There seems to be confusion of what a neighbourhood plan can do and what is the responsibility of the Local Planning Authority.	See above
SDNP	BT6	See emerging SDNP Local Plan policy SD20: Sustainable Tourism and the Visitor Economy. It may be that this policy is unnecessary or conflicts with emerging SDNP Local Plan Policy. There is a need to ensure that all development supports the duty and purposes of the National Park and it may be appropriate to reference this at the end of the policy wording	Add support for Policy SD20 - also replace settlement boundary with recognised village residential boundary Map

Respondent	Policy Reference	Comment	Response
Historic England	BT7	<p>Policy BT7: Rural buildings: We support the inclusion of a requirement that new development to reuse rural buildings for small businesses should not result in adverse impacts on any architectural or historic features. However, it is often a point of disagreement on whether a proposal would result in ‘adverse impacts’. The National Planning Policy Framework described features of the historic environment that merit consideration in planning as ‘heritage assets’ and we would recommend using this term for architectural or historic features if the intention is to refer to buildings or sites. The NPPF also instructs local planning authorities to have regard to the ‘harm’ that a development proposal would have on the ‘significance’ of a heritage asset as the means of deciding whether it is acceptable alongside other balancing factors. As such we would recommend rephrasing this policy to ensure it is aligned with national planning policy to read “The re-use, conversion and adaptation of rural buildings for small businesses, recreation, or tourism purposes will be supported in principle subject to the following criteria:</p> <p>x. The use proposed and physical works to implement it will not result in have an adverse impact harm to the significance of on any on any heritage assets archaeological, architectural, historic or environmental features that is not unavoidable, mitigated or clearly and convincingly justified by the public benefits of the scheme.”</p>	Policy removed

Respondent	Policy Reference	Comment	Response
SDNP	BT7	See emerging SDNP Local Plan policy SD48: Conversion of Agricultural Buildings. It may be that this policy is unnecessary or conflicts with emerging SDNP Local Plan Policy SD48.	Policy Removed
SDNP	BT9	<p>There have been a series of recent changes to legislation relating to renewable and low carbon energy and local parking standards. See ministerial statement 23 March 2015 - "Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network."</p> <p>See ministerial statement 25 March 2015 – "Neighbourhood plans should not be used to apply the new national technical standards"</p> <p>https://www.gov.uk/government/speeches/planning-update-march-2015</p> <p>Draft policy SD55 Renewable Energy of the emerging SDNP Local Plan should be reviewed to see if the Clapham NDP can add detail.</p>	Aspirational policy only.
SDNP	CFW1	Should such accommodation be supported throughout the Parish or would more central locations where there is at least some access to facilities be more appropriate? See point 1.5 above reference to where the CNDP policies apply.	Isn't that a commercial decision. We seek only to support applications if presented.

Respondent	Policy Reference	Comment	Response
WSSC	CFW2	The parish council could consider whether the provision of recreational facilities includes the Public Rights of Way (PROW) network.	Not relevant
Patching NDP	CFW2	In respect of the Village Hall (located within Patching parish) we support the policy <u>subject to</u> , consideration of the type and scale of recreational facilities and those that Patching Parishioners have identified as appropriate via responses to our NHP surveys. The policy should be revised to reflect this.	Covered within the policy
Community Shop Project	CFW3	Who decides a reasonable price? Does listing have a benefit	Explain the rules relating to assets of community value
SDNP	CFW3	Make it clear whether it is the intention of the Parish Council or other community group to seek to register these properties and clarify whether this is indeed appropriate. Have the relevant authorities / landowners been consulted. Currently as drafted the policy could conflict with any such registration.	Already registered. Add justification to each one.
Southern Water	CFW4	Proposed amendment To ensure consistency with the NPPF, we propose the following additional wording to policy CFW4: <i>The Parish Council has designated the areas shown in Schedule B as Local Green Space. Proposals for development of these areas will not be permitted except in special circumstances, such as where the development meets specific necessary utility infrastructure needs and no alternative feasible site is available.</i>	Agreed

Respondent	Policy Reference	Comment	Response
SDNP	CFW4	Experience at the recent Petersfield NDP Examination highlights the need to evidence how these sites have been selected and justify how they meet the requirements as set out in the NPPF paragraph 77. What do they add to the existing level of protection? How are they demonstrably special? Use of the term 'special' within the policy is unclear, suggest the term 'exceptional' may be more appropriate.	Increase the justification detail.
ADC	CFW4	Do they meet the criteria expressed in the NPPF?	Yes
SDNP	ES1	<p>Policy ES1 is considered fit for purpose providing the paragraph at second bullet point is amended as follows:</p> <p>Consideration should be given to the use of Sustainable Urban Drainage Systems (SUDS) as alternative to conventional drainage where appropriate, but not where the winter water table is less than 0.7 of a meter below ground level. Sustainable drainage systems on private property, whether they are private or adopted, must be approved by the relevant SUDS Approval Body (SAB) SDNPA prior to the commencement of development and conform to the recommendations of the SUDS Manual produced by CIRIA. All approved sustainable drainage systems shall be recorded on the flood risk register.</p>	Agreed

Respondent	Policy Reference	Comment	Response
ADC	ES1	The reference to SAB should be removed as there is not going to be one What is the definition being used for 'deliverable and sustainable'?	See above
Historic England	ES2	Policy ES2 We support the use of Policy ES2 to provide recognition of the importance of hedgerows and ancient trees as part of the Parish's historic rural landscape and to secure their retention in new development.	Noted
Natural England	ES2	<p>Generally we feel the Plan deals reasonably with the natural environment. We welcome the commitment to protect high grade agricultural land and support provision of good quality green infrastructure and wildlife corridors and improve access to nature for the local communities.</p> <p>Although protection and enhancement of the area's trees and hedgerows runs strongly throughout the plan, we would like to see specific reference to ancient woodland in section 5.7 Environment & Sustainability (p36) and Policy ES2. Although the area's ancient woodland is mentioned elsewhere, and this may seem like repetition, it is important to note that it is an irreplaceable habitat. The NPPF (para 118) states that "... planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss". We support the ambition to protect all the area's woodland and hedgerows in the Plan but it is still worth noting that greater weight should be afforded to this habitat.</p>	Amend policy to add words Ancient Woodland to first line.

Respondent	Policy Reference	Comment	Response
SDNP	ES2.3	ES2.3 – The planning system has little role to play in the change of use of land from woodland to another agricultural use, unless the trees are covered by a Tree Preservation Order. However, there may be a need for a felling license which is obtained through the Forestry Commission.	This is not a policy just supporting text- change wording to ...farmers and landowners will be encouraged
Historic England	ES3	Policy ES3 Renewable Energy. To ensure that schemes are guided to sustain and enhance the significance of heritage assets as elsewhere in the plan, we would recommend that bullet point b) of the policy is amended to "... landscape, heritage assets , views...".	Agreed
Historic England	ES4	Policy ES4 Buildings and structure of character. We strongly support the use of Neighbourhood Plans as an opportunity for communities to identify features of the historic environment that are considered to have a special local value for their historic, architectural, archaeological or artistic interest. As the policies of the neighbourhood plan should be focused on providing guidance for decisions regarding new development. The identification of the intent to pursue the use of article 4 directions to further protect the character and interest of these buildings should be removed from the policy text. It would be suitable to include in the supporting text appropriately labelled as an action intended to support the implementation of the policy.	Leave it in as we believe it is the only way to protect the important features of such buildings

Respondent	Policy Reference	Comment	Response
Patching NDP	ES4	We would recommend that Clapham and Patching Village School be included in the SDNP list of buildings and structures of special character, as evidenced by its Grade II listing	It is Listed therefore should not be in the list of buildings of special character.
Historic England	ES5	Policy ES5 Conservation Area. We support the use of this policy to highlight the need to take the setting of the Conservation Area into consideration in particular. It might be helpful to provide some clarity by identifying any feature of the Conservation area's setting , such as its historic rural character, that particularly merits consideration as a result of its contribution to the conservation area's significance.	Reference the CA details
SDNP	ES5	New areas identified for Conservation Area status should be presented to SDNPA Conservation Officers at the earliest possible opportunity to ensure these can be considered as part of the CNDP development	Point removed
WSCC	ES6	It is welcomed that the parish council will be active in negotiating new open access and permissive path agreements, but the policy is restricted if only with the ambition for improving walking. It is suggested that this is re-worded to include routes for cyclists and horseriders. Also, the parish council could be involved in negotiation of new PROW.	Change the policy to read - Clapham Parish Council will seek to negotiate further open access and permissive paths, bridle and cycleways with local landowners to open up access for walking, cycling and horse riding within the Parish.

Respondent	Policy Reference	Comment	Response
SDNP	ES6	As currently stated Policy ES6 is not a land use planning policy and is therefore not appropriate to be included in the CNDP. It is suggested that this aspirational policy could be moved to an appendix.	See above
Historic England	ES8	Policy ES8 Old Flint and Brick Walls. We strongly support the use of Neighbourhood Plans as an opportunity for communities to identify features of the historic environment that are considered to have a special local value for the historic, architectural, archaeological or artistic interest. As such we see this policy as an important element of the plan in seeking to ensure new development sustains the character of the village and its environs. We would recommend identifying the importance of old flint and brick walls to the character of the area earlier in the document at section 3.3.5 to ensure the plan establishes a robust basis for this policy.	Agreed
SDNP	GA1	The final sentence 'Existing community transport will be preserved and, where appropriate, be enhanced as demand increases' is not a land use policy, therefore this sentence should be moved to the supporting text at GA1.3 or removed to an aspirational policy in an appendix	Agreed
WSCC	GA2	Supporting text: Recognising the issue of cyclists using footpaths, please state that means to deliver this includes upgrading (with the landowner and County Council) the status and surfacing of existing footpaths to bridleways (there is no PROW status solely for FP and cycle), as much as the creation of new routes.	Agree + add the issues of cyclists

Respondent	Policy Reference	Comment	Response
SDNP	GA2	The following text is not relevant to land use matters and therefore not appropriate to be included in this land use policy 'while also supporting the prevention of improper use of existing footpaths'	move the words to the supporting text
WSCC	GA3	<p>Policy GA3 School Travel Planning safe walk to school routes</p> <p>Working with the school community local schools and the Local Highway Authority school travel plans will be reviewed/ developed and promoted. Safer routes to the school and school bus stops will may be identified as part of these plans and the necessary improvements or additions will be provided, including resisting access to Clapham school by car. Measures, including traffic calming, that seek to ensure appropriate traffic speeds without unnecessarily increasing signage throughout the Parish will be supported.</p>	Agreed
Patching NDP	GA3	<p>We support the intention to work with local schools and the Highways Authority to review/ develop/promote school travel plans</p> <p>GA3.2 – we support the intention to maximise use of the car park at the Village Hall and provide a "Safe Walk to School" route</p>	Noted

Respondent	Policy Reference	Comment	Response
SDNP	GA3	<p>Clarification is needed, are the bus stops for secondary school pupils only? What exactly does 'resisting access to Clapham School by car' mean and how would this be used in the determination of a planning application? Is this a land use policy or could this policy be included as an aspirational policy in an appendix.</p> <p>The following rewording of policy GA3 is also proposed:</p> <p>Working with the local schools and the Highway Authority school travel plans will be reviewed/ developed and promoted. Safer routes to the school and school bus stops will be identified as part of these plans and the necessary improvements or additions will be provided, including resisting access to Clapham school by car. Measures, to include traffic calming, to ensure appropriate traffic speeds are achieved as part of overall schemes that fit within the landscape of the SDNP and improve cycling and walking opportunities for students and their families' that seek to ensure appropriate traffic speeds without unnecessarily increasing signage throughout the Parish will be supported.</p>	Is the landscape value of the SDNP more important than the safety of children?
WSCC	HD1	Please clarify whether this policy could prevent the creation of new PROW or improvements to existing PROW.	No because creation of a footpath is not development.
SDNP	HD1	Grade 1, 2 and 3a Agricultural Land. Where is this land within the Parish?	Policy removed

Respondent	Policy Reference	Comment	Response
Historic England	HD2	<p>Policy HD2: We support the use of design briefs in informing high quality design for new development. We would recommend, however, that the policy makes it clear whether this is a brief prepared by the Parish Council or to include a requirement for the applicant to agree the brief with the National Park Authority, in consultation with the Parish Council, to ensure that it meets the community's aspirations. Amended wording of this policy might therefore read "Plans Proposals for new development must demonstrate how they meet the policies set out in this Plan, and should will be assessed against be subject to a design brief, agreed in writing with the South Downs National Park Authority in consultation with the Parish Council, which demonstrates how the character of the parish will be reinforced.</p>	Agreed
SDNP	HD3	<p>HD3 Housing mix The ability to seek a mix of homes will depend on the size of the site and may not always be possible.</p> <p>The planning system can not restrict the letting of homes and indeed homes for rent unless they are social housing. Where is the evidence to suggest that this is an issue in the Parish?</p> <p>There is a need to ensure that this policy is compatible with the emerging SDNP Local Plan policy SD24: Affordable Housing Provision</p>	Remove - Proposals that involve the provision of housing for Buy to Let investment opportunities will not be supported. Complies with policy SD24

Respondent	Policy Reference	Comment	Response
ADC	HD3	This policy needs to be re-worked. It is unwieldy and mixes policy with supporting text. It also requires evidence and justification.	The housing needs survey provides the justification
SDNP	HD4	<p>Where is the evidence to support a density of 24dph. What if the homes are to be flats, which might meet the needs of a number of people in the community?</p> <p>The emerging SDNP Local Plan policy on affordable housing (SD24) seeks a minimum, rather than maximum, of 40% affordable housing so it would appear that this policy conflicts. The need to set an affordable housing requirement may be negated by the preparation of the SDNP Local Plan, so there is a need to consider whether there is anything that can be added by the CNDP, or will these be merely repetition.</p>	Density justified by the density of Clapham Common - add figures into Plan. Survey residents told us they wanted development that was in keeping with the surrounding area - there are no flats in the village. They also said they wanted bungalows. SDNP states a target (not minimum) of 40% affordable.
ADC	HD4	How has the density number in this policy been reached/ determined? What is the evidence to support the maximum 40% affordable housing figure or maximum density of 24 units per Ha in this policy?	See SDNP comment.
Alan & Tricia Perrett	HD5	By using the broad term 'community facility development' in this policy we are concerned that this would not necessarily secure the future of a village shop/cafe in that it could allow some other community use instead.	Changed

Respondent	Policy Reference	Comment	Response
WSSC	HD5	<p>Given that the pre-submission Neighbourhood Plan for Clapham includes proposed small scale housing site allocation, it should be noted that site specific principles 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 principles at this stage. In considering site specific principles, please refer to the attached Development Management guidance. The County Council currently operates a scheme of charging for highways and transport pre-application advice to enable this service to be provided to a consistent and high standard. Please find further information on our charging procedure through the following link:</p> <p>http://www.westsussex.gov.uk/leisure/getting_around_west_sussex/roads_and_pathways/plans_and_projects/development_control_for_roads/pre-application_charging_guide.aspx</p>	Noted

Respondent	Policy Reference	Comment	Response
Patching NDP	HD5	<p>The policy requires development coming forward on land identified on the Proposals Map to redevelop the former BMX track site to a recreation/leisure site and provide a new community facility development either on the existing shop/café site or adjacent to the Village Hall.</p> <p>We do not support this policy as currently drafted. The Village Hall is situated within Patching Parish. The policy does not seek to ensure that a “community facility development” coming forward is appropriate in terms of scale, form and use to the character of Patching Parish, nor Clapham Parish.</p>	Policy amended; additional suggested site would be within the new housing development. Use of the Village Hall site would be a matter for the adult residents of both villages (as Members of the Charity) to determine - this has been clarified in 3.6.5.
Highways England	HD5	<p>Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN) in this case the A27, particularly at its junction with the A280. We assess Neighbourhood Development Plans on the basis of potential sites being brought forward and the accompanying trip generations and whether or not these are included within the relevant Local Plans. I note that the Plan contains a small amount of housing (30 dwellings) and also the potential for a small amount of commercial development befitting the nature of the village (i.e. not heavy industrial). Accordingly, having considered the likely traffic impacts resulting from the potential developments I have concluded that there will be little to no noticeable impacts on the safe operation of our network and therefore have no objection or formal comments with regard to the plan.</p>	Noted

Respondent	Policy Reference	Comment	Response
Southern Water	HD5	<p>Proposed amendment</p> <p>Accordingly, we propose the following text for policy HD5:</p> <p><i><u>Any development must ensure future access to the existing sewerage and water infrastructure for maintenance and upsizing purposes.</u></i></p>	Utilities have this power anyway
SDNP	HD5	<p>The sites referred to would benefit from a reference number and a clearer OS map so that the sites can be viewed clearly by someone who is not familiar with Clapham Parish.</p> <p>The SDNPA welcomes the ambition of the plan to allocate land for housing in order to meet some of the identified need in the community. This is one of the main reasons a community might wish to prepare a NDP. However, the policy as written which allows for the use of one or the other piece of land does not 'provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency' (NPPF para 17) and is therefore not fit for purpose. The delivery of land for housing needs to have some degree of certainty for landowner and community. As written it implies that a race might take place between competing landowners and the first one to gain permission will stop the other site being considered further. This is not an appropriate way to manage the delivery of sites. There is a need to assess the suitability, need for such development and the likely deliverability of the sites and to formulate your allocation of the land based on that robust, proportionate information.</p>	Define the land for housing. The issues of the landfill site have been comprehensively addressed in the SEA including maps provided by ADC EH officers. Provide land parcel sizes for existing developments

Respondent	Policy Reference	Comment	Response
		<p>HD5.1 Experience from the Petersfield Neighbourhood Development Plan Examination shows the importance of understanding the current status of sites and their deliverability over the plan period. What information do you have to support the allocation of these two sites? Is there any realistic possibility that the builders merchant will move to a new location? The CNDP will need to demonstrate that any allocated sites are suitable, available and achievable before they can be allocated, as per reference in NPPF footnote 11.</p> <p>It is likely that a new housing development will provide a CIL receipt. As the redevelopment of the former BMX site is not a requirement based solely upon the extra burden that this new development would place on the village it would appear unlikely that such a scheme could be entirely funded through this means, albeit that some of the CIL receipt gained might go towards it. To require a developer to fund it entirely may be unreasonable and place the viability of their development into question.</p> <p>The remainder of the policy is unclear. It may not be in the gift of the developer to provide a community development on the existing shop / café land as it is not within their ownership. Indeed how this would work with the existing uses on the land and what type of community facility are you seeking. Where is the alternative safe access to the site, are there any constraints on alternative safe access to the site?</p>	

Respondent	Policy Reference	Comment	Response
ADC	HD5	<p>the use of the term “for a maximum of 30 new homes” by imposing a ceiling or cap on total development does not have regard to national policy in which there is a presumption in favour of sustainable development. It is however understandable that those people preparing a neighbourhood plan will seek to estimate individual site capacities in order to appreciate whether or not provision will meet local need. Actual numbers of homes achieved on sites will be determined on a site by site basis when detailed schemes are prepared and assessed taking into consideration site constraints. It is therefore recommended that it be reworded as “The Neighbourhood Plan provides for the development of a minimum of 30 new homes ...’</p>	Amend the policy to explain the land allocation

Respondent	Policy Reference	Comment	Response
Historic England	HD6	<p>Policy HD 6: We support the identification of the impact of windfall development on the character of the conservation area, listed buildings and SDNP as material considerations in determining whether it is suitable. Neighbourhood Plans provide an opportunity to harness the enthusiasm of the community for guiding planning decisions. To guide how policies such as this are implemented the community might consider preparing a short character statement or conservation area appraisal for the village describing the key valued features of its character, such as the features that contribute to its 'rural' character and the features of the conservation area that merit its designation. We note that the Strategic Environmental Assessment provides useful details concerning the characteristic historic features of the area's buildings, which might form the starting point of such work. Historic England have supported the development of character assessment toolkits which the Parish Council might find of use in developing a formal Character Statement for Clapham (see the Oxford Character Assessment Toolkit for example: http://www.oxford.gov.uk/PageRender/decP/CharacterAppraisalToolkit.htm).</p> <p>Such a study might be prepared in partnership with the South Downs National Park Authority, in order to ensure that it is given weight in planning. If the community would like to pursue such a route at a future date, we would recommend including a reference to the need for applicants to demonstrate that their development has responded positively to any character statement or design guidance prepared by the Parish Council as part of this policy.</p>	Provide link to Conservation Area SPG

Respondent	Policy Reference	Comment	Response
SDNP	HD6	Where does this policy apply? Throughout the entire parish or only within parts of the core village. What do you mean by infill – is it land to the rear of the property of gaps within built frontages? Do any such places exist?	Infill is a normal planning term. It will apply to any land within the existing built area. Adding a settlement boundary seems superfluous for a hamlet within a National Park; alternative wording used.
ADC	HD6	Impacts from extant unimplemented permissions cannot be taken into account in the determination of applications. Same comments as the previous policy above with regard the 40% figure. Is it practical to require that all brownfield sites within the boundary be used - are there sufficient?	As this document will be used by the PC in responding to applications, the number of extant permissions will be relevant in their determinations.
ADC	HD7	Unsure how this will be measured and therefore seems like it would not be useable to DC officers. Perhaps this needs fine tuning to add some clarity.	Quality and scale of outdoor space would be judged on an application-by-application basis, in relation to surrounding housing and open space.

Respondent	Policy Reference	Comment	Response
Historic England	HD8	<p>Policy HD8 We support the identification of a range of minor design details as requiring specific consideration and control in development decisions in order to sustain and enhance the character of the village environment and the appearance of the conservation area in particular. To ensure this policy is established on an assessment of the area's defining characteristics we recommend explaining in the supporting text to the policy or at 3.3.5 that, in addition to the larger scale features of country lanes, grass verges, hedgerows and historic cottages and farmhouses, the rural character of the village is influenced by the absence of such items of visual clutter or suburban character or the distinctive style of the minor features, for which this policy provides a management tool.</p>	Agreed

Respondent	Policy Reference	Comment	Response
SDNP	HD8	<p>Bullet point 5 (lighting schemes) - Consider the emerging SDNP Local Plan policy SD9: Dark Night Skies.</p>	<p>Change policy wording to Findon words Policy CFW7: 'Unlit village' status</p> <p>Development proposals which detract from the unlit environment of the Parish will not be supported. The importance of dark skies will be respected throughout the Parish as a priority. Street lighting will be discouraged even within the core village until such time as the majority of the community within the village demands it, at which point the type of lighting will be required to conform to the highest standard of light pollution restrictions at the time. Security and other outside lighting on private and public premises will be restricted or regulated to be neighbourly in its use (e.g. ensuring lighting is deflected downwards rather than outwards or upwards, that it is switched off after midnight at the latest, and that movement-sensitive triggers are regulated to reduce illumination periods to a minimum), including floodlighting at equine establishments and on sports fields or sports grounds.</p>
Findon PC	HD9	<p>We welcome the aim of nurturing close links with Patching & ourselves including, specifically, the 'Local Connection' aspect in relation to their policy on affordable housing (Policy HD9). We would draw their attention to the fact that the proposed allocation of 50 homes to Findon (referred to in their SEA) has now been revised by SDNPA to 20.</p>	Noted
Patching NDP	HD9	<p>We support this policy. We welcome the inclusion of Patching parishioners within the qualifying criteria.</p>	Noted

Respondent	Policy Reference	Comment	Response
SDNP	HD9	<p>This policy needs to be reviewed in light of any allocations policy that Arun District Council operates and their response is required. If these homes are affordable houses, then they will be allocated to those on the housing register by Arun District Council in consultation with the housing provider and potentially the Parish Council (dependent on the protocols in your area).</p> <p>These homes are not available for purchase in the first instance.</p> <p>As written it is likely that this policy is inappropriate and much falls outside of the remit of planning and the CNDP.</p>	ADC policy makes an exception for Clapham and Findon of 75% of housing to local connection
ADC	HD9	Does this accord with the NPPF and the LPA's local connection policy? There appears to be insufficient evidence to support the policy and it is too prescriptive and seems inflexible to promote sustainable development.	There is evidence of housing need via the survey and ADC has a policy to support this.
Alan & Tricia Perrett	HD10	We accept that there is a problem of on-street parking in The Street. However, the policy is inflexible and could rule out some community uses, such as an improved shop/cafe, which are acceptable under policies in all other respects. We suggest that a caveat could be added (as in Policy ES3) which states 'Notwithstanding the above, schemes which can be proven to provide benefit to the community will be considered on their merits'.	Don't agree. Parking outside the existing shop/café site would not be possible as the land has been registered as Green Open Space, protecting it from further development.
WSCC	HD10	In the supporting text for this policy, please refer to the County Council's Guidance on Car Parking in Residential Developments and Revised County Parking Standards and Transport Contributions Methodology.	Done

Respondent	Policy Reference	Comment	Response
SDNP	HD10	<p>This policy may be in conflict with the Ministerial Statement of the 25th March which related to the need to ensure there is adequate parking provision both in new residential developments and around town centres https://www.gov.uk/government/speeches/planning-update-march-2015. The thrust of the statement was concerned about the imposition of maximum parking standards. The Statement states that Local Planning Authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network.</p> <p>Could the policy be better worded to ensure that new development consumes its parking requirements on-site so as not to add to the existing congested roads, unless evidence can be presented by the applicant that sufficient on-street parking is available.</p>	Agreed, have incorporated wording as suggested in para 2.
ADC	HD10	<p>The current standards under the Local Plan (2003 ALP) have become the County ones, so best to just refer to these. Is it practical to require 'enforceable provision' – what would the impact be on work by SDNPA or WSCC? Is there agreement for this from either?</p>	Agreed
Historic England	HD12	<p>Policy HD12 Clapham and Patching School. We support the use of this policy to secure a future use for this historic building, which will ensure it continues to serve and be accessible to the community.</p>	Noted

Respondent	Policy Reference	Comment	Response
Patching NDP	HD12	We do not support this policy. Consultation with Patching parishioners evidences overwhelming support for the School and consider it to be a valued village asset. We anticipate policy within the Patching NHP supporting the continued operation of the school.	Wording strengthened to make clear that we support continuing use as a school for as long as viable, and would only support this alternative use if there was no option but to close the school at some point during the next 20 years.
SDNP	HD12	What evidence is there that the school may close in the life of the plan? The school premises have been identified in the Plan as a community asset which then conflicts with the suggested conversion to sheltered / assisted living accommodation etc.	See above.
Haydn Smith		Car park at the village hall is for the use of hall users only, the school are permitted to use it as an exception.	Noted

The original copies of the responses can be found in the Evidence Base.