

01 November 2017

Boxgrove Parish Council

Dear Sirs,

Subject: Boxgrove Parish Neighbourhood Plan – Reg 14 Pre-submission plan

Thank you for consulting the South Downs National Park Authority (SDNPA) on the pre-submission consultation draft of the Boxgrove Neighbourhood Plan. The SDNPA welcomes the publication of this plan, which is a result of a considerable amount of hard work by the parish council and the local community.

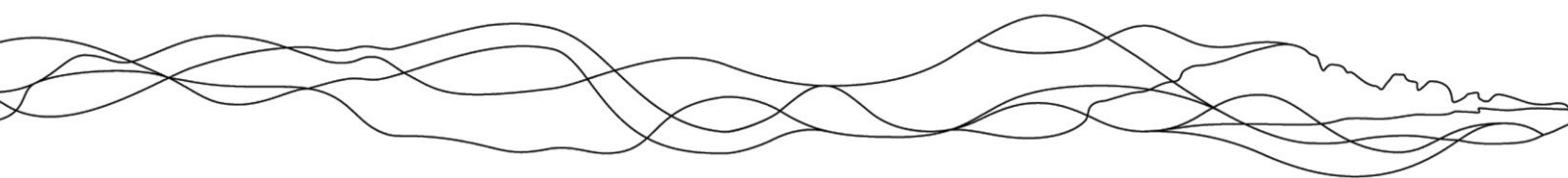
Around half of Boxgrove parish is in the South Downs National Park (SDNP), although the main settlements Boxgrove, Halnaker, Crockerhill and Strettington are outside the SDNP. On the 14 March 2013, the SDNPA designated this area as a Neighbourhood Area following an application from Boxgrove Parish Council. As the area of the Parish within the SDNP is largely countryside, these comments focus on elements of the Boxgrove Neighbourhood Plan most relevant to the National Park:

How the Neighbourhood Plan fits into the Planning System

For the area within the SDNP, the Neighbourhood Plan also needs to be in line with the saved policies of the Chichester Local Plan 1999. The SDNPA is preparing a new Local Plan which will in time replace the 1999 Chichester District Council (CDC) Local Plan. The emerging South Downs Local Plan is currently out for pre-submission consultation until the 21st November 2017. As a substantial area of the parish is in the SDNP, the Neighbourhood Plan also needs to be consistent with the DEFRA Vision & Circular on English National Parks and the Broads. As the main settlements are outside the SDNP, CDC is the lead authority for the neighbourhood plan. The Boxgrove NDP will need to be submitted to CDC for independent examination. Following a successful referendum, the Boxgrove NDP will be 'made' (adopted) by CDC and the SDNPA and will be part of the Development Plan for both planning authorities.

2.1.2 Local Planning policy

The SDNPA is the planning authority for the area of the parish within the National Park. It would better to describe the parish as falling within two planning authority areas rather referring to the SDNPA as 'secondary'. The South Downs Local Plan is currently out for pre-submission consultation until the 21st November 2017. Prior to this, a preferred options consultation was carried out in September-October 2015. The South Downs Local Plan is due to be adopted in September 2018.



Policy SBI Settlement boundary/recognised village envelope

We note the settlement boundary and recognized village envelope shown in Maps F and G. We would query where the village envelope for Halnaker has come from and whether it is justified? It is also not clear how the village envelope is intended to function – does it have the same status as a settlement boundary? Map F shows the boundary for Halnaker directly abutting the SDNP and at one point (Mews Cottage, Park Lane) extending into the SDNP. Putting aside our fundamental questioning of the purpose of the envelope, we are concerned and object to the proposed boundary extending to the SDNP boundary as this does not follow the built form of Halnaker and includes substantial areas of paddocks and the grounds of Halnaker House. We also have concerns about the boundary being drawn right up to the Devils Ditch. In addition we would recommend that Mews Cottage is not included in the boundary as it falls on the far side of Park Lane. We assume that the Boxgrove settlement boundary will be extended to reflect the small housing allocation at Policy H3. The policy wording should refer to other policies in the development plan rather than just the Neighbourhood Plan.

Policy EH4 Surface water management

The Neighbourhood Plan could seek to take a stronger stance on surface water management, particularly given the localized flooding issues. Emerging South Downs Local Plan policy will require development to ensure there is no net increase in surface water run-off, taking into account climate change.

Policy EH5 Development on Agricultural Land

Map C has data from the Natural England Magic Map - this data set appears to be rather incomplete and we assume just shows land which happens to have been surveyed. If so, it could be misleading. Land not surveyed would need to be surveyed using the Agricultural Land Class methodology at the point of an application. Perhaps this policy could be reworded to remove reference to Map C, and just refer to safeguarding the most fertile agricultural land from development in accordance with the NPPF?

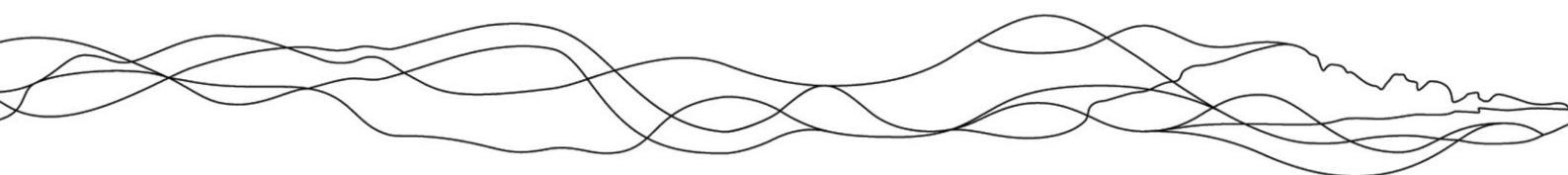
Policy EH6 Landscape character and important views

The supporting text refers to extracts from the Halnaker and Boxgrove Conservation Area Appraisals. As this policy is about landscape character it would be appropriate to refer to the predominant landscape character which is the Goodwood Wooded Estate Downland. Key characteristics of this area include the rolling chalk ridges, extensive areas of broadleaved and mixed leaved plantation as well as areas of ancient woodland and the historic parkland landscapes of Goodwood and Halnaker Park.

It would be helpful to show the important local views and features on a map. It is not clear what is meant by positive 'unlisted' buildings – it would be more helpful to include a list of such buildings. Are the Goodwood flint walls a feature from which you can have views or look out from? These appear to be more likely local heritage assets in themselves rather than important views.

Policy EH7 Dark Skies

We welcome the policy on dark night skies. Dark night skies are a special quality of the SDNP and this is recognised by the National Park's International Dark Sky Reserve status.



Policy EH9 South Downs National Park

We note and welcome policy EH9 which is in line with the purposes and duty of the National Park. The supporting text refers to just a small area of the parish being within the SDNP. However, at least 50% of the parish area is within the SDNP and this area provides the rural setting for the settlements as well as the locally valued views to the Downs and footpaths leading to the wider countryside. Key attractions such as Halnaker Windmill and Goodwood are also in the SDNP. Greater prominence should therefore be given to the SDNP area of the parish throughout the Neighbourhood Plan.

Policy EE2 Tourism activities

The emerging South Downs Local Plan has a detailed policy on Sustainable Tourism which will apply to proposals within the National Park. However, the Boxgrove Neighbourhood Plan could incorporate elements of this policy into policy EE2 to ensure tourism proposals are considered consistently across the parish. For example, additional criteria to Policy EE2 could include ensuring proposals make use of existing buildings wherever possible, proposals minimise the need to travel by car and outside the settlement boundary, proposals have access to the public rights of way network.

Policy EE4 Agriculture/Horticulture/Equine/Viticulture employment

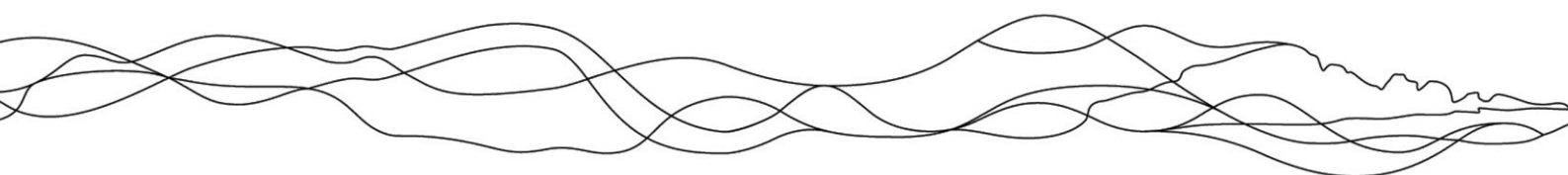
This policy is quite inflexible and currently refers to the change of use of land rather than buildings which does not require planning permission in most cases. The policy could be more positively worded to support proposals that promote and protect employment activity in farming, forestry and tourism.

Policy H3 Windfall Sites

We welcome the completion of a Heritage Impact Assessment in support of the allocation of development of land at the Old Granary, Boxgrove. In light of the evidence base and to strengthen the policy, reference should be included to maximizing enhancements and minimizing harm to the setting of identified heritage assets. In addition, we recommend that the supporting text relating to the Old Granary site includes some additional wording along the lines that the design and layout of the development will need to reflect the historic sensitivities of the site. In addition to the courtyard development there is also the possibility of reinstating a detached dwelling along the frontage of the site given the historic precedence for a dwelling here. We would also question whether the site merits its own policy rather than being grouped in with other windfall development.

Policy GAI Footpath and cycle path network

This policy references that new housing development will be expected to contribute (via development contributions) to enhancement of footpath/cycle network. However, this is unlikely to meet the tests of S122 of the Community Infrastructure Levy (CIL) Regs, which state a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is a) necessary to make the development acceptable in planning terms; b) directly related to the development, and; c) fairly and reasonably related in scale and kind to the development.

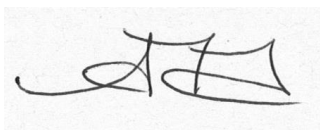


Policy GA4 Promoting sustainable movement

The Parish Council have clearly identified priorities for future CIL funding which is very helpful although the schemes themselves would better sit in the supporting text rather than the policy text. The Plan should make clear that this is how the Parish Council will direct its proportion of CIL. CDC and SDNPA will ultimately decide on how other CIL money is spent.

We hope you find these comments helpful and please do get in touch if you would like to discuss any of the above or require any clarifications.

Yours sincerely,



Amy Tyler-Jones
Neighbourhood Planning Officer
Amy.tyler-jones@southdowns.gov.uk
01730 819272

South Downs Centre, North Street,
Midhurst, West Sussex, GU29 9DH

T: 0300 303 1053

E: info@southdowns.gov.uk
www.southdowns.gov.uk

Chief Executive: Trevor Beattie

