

SDNPA response to the Plaistow & Ifold Pre-Submission Neighbourhood Development Plan (NDP)

Requested new wording is underlined and deleted wording is ~~struck through~~.

NDP Reference	SDNPA Comment	SDNPA Recommendation to Plaistow & Ifold Parish Council
General comment	<p>Firstly, the Plan needs clarity about the two local planning authorities (LPAs) covering the Parish, that is Chichester District Council and the South Downs National Park Authority. The consequence of there being two LPAs is the Neighbourhood Plan will form part of two separate Development Plans for the Parish area inside and outside the South Downs National Park.</p> <p>Secondly the Plan needs to be explicit that those parts referred to as AIM are aspirations for the Parish rather than policies. The format with the use of boxes and the wording for the AIMs still gives an impression they are equivalent to the policies.</p>	Note the two comments on the left and the specific recommendations made later in this document.
New paragraph to be inserted after Paragraph 1.4	Add a new paragraph to explain that the Parish Council is required, as a relevant public body “to seek to further the purposes” of the National Park following changes to the legislation covering protected landscapes. The National Park & Access to the Countryside Act 1949 has been amended by Section 245 of the Levelling Up & Regeneration Act (LURA) 2023.	<p>Add a new paragraph as follows: <u>“The National Parks & Access to the Countryside Act 1949, as amended by section 245 of the Levelling Up and Regeneration Act 2023, requires all relevant public bodies which includes the Parish Council, to seek to further the purposes of the National Park:</u></p> <ul style="list-style-type: none"> • <u>Purpose 1 – To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and</u> • <u>Purpose 2 – To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.”</u>
Paragraph 1.3	Add wording to clarify the status of the AIM sections with the Plan.	Add a second sentence to the paragraph. <u>“Those sections of this Plan preceded by the word ‘AIM’ refer to community aims and</u>

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		<u>aspirations. They are not policies and do not form part of the Development Plan policies for the Parish.</u> ”
Paragraph 1.4	Add wording at the start of the paragraph to clarify the position in the Parish with the two local planning authorities and the two Development Plans of which the Neighbourhood Plan will form part. Amend the existing wording to clarify the position for the parts of the Parish inside and outside the South Downs National Park.	Add sentence at the start of the paragraph and amend what would become the second sentence. “ <u>For planning purposes, the Parish is split between the two local planning authorities of Chichester District Council and the South Downs National Park Authority.</u> The Neighbourhood Plan will form part of the Development Plan for the Parish <u>outside the National Park</u> in conjunction with the Plaistow and Ifold Development Plan Document (DPD). Add new last sentence to the paragraph. “The Neighbourhood Plan will form part of the Development Plan for the Parish for the area inside the National Park in conjunction with the South Downs Local Plan.
Paragraph 1.6	Amend the wording to clarify the use of the Neighbourhood Plan in the two LPA areas.	“In the future planning applications for development will be assessed against the policies in the DPD, <u>the South Downs Local Plan and the Neighbourhood Plan as appropriate.</u> ”
Paragraph 3.3	Amend the wording to clarify that part of the Parish is within the South Downs National Park as well as the Parish having an impact on the setting of the protected landscape.	Amend the last sentence as follows: “...and with recognition of the importance of this <u>that part of the Parish is within the South Downs National Park; as well as the importance of the Parish</u> in contributing to the setting of the South Downs National Park protected landscape. ”

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POLICY HI – LOCAL HOUSING NEEDS	Amend the wording for circumstances where development was proposed within the National Park part of the Parish.	<p>Amend the policy as follows:</p> <p>First sentence, “...with the Chichester Local Plan 2021-2039 Policy H4 <u>or the South Downs Local Plan as appropriate.</u>”</p> <p>Second sentence, “...identified Parish housing need as evidenced in the Local Housing Needs Assessment APPENDIX A and the latest CDC Housing and Economic Development Needs Assessment (HEDNA), <u>or the South Downs HEDNA</u>, available at the time the planning application is submitted, <u>as appropriate.</u>”</p>
POLICY EE1 – SUPPORTING THE LOCAL ECONOMY	Amend the wording for circumstances where development was proposed within the National Park part of the Parish, to include the purposes for which the protected landscape was designated.	<p>Amend the policy as follows:</p> <p>Second sentence, “...appendix C in the emerging CDC Local Plan, 2021-2039, <u>or the marketing guidance in the South Downs Local Plan as appropriate.</u>”</p> <p>Last sentence, “...which would impact adversely on the countryside or result in the loss of agriculture, <u>and in the South Downs National Park demonstrate how the proposal conserves and enhances the landscape.</u>”</p>
POLICY EE3 – BROWNFIELD SITES	Add another criterion for circumstances where development was proposed within the National Park part of the Parish, to include the purposes for which the protected landscape was designated.	<p>Add new criterion (e) as follows:</p> <p><u>“Where the proposed development is within the South Downs National Park part of the Parish, demonstrate how the proposal conserves and enhances the landscape.”</u></p>

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Section 6 Community Assets and Recreation & Section 8 Environment and Community Connectivity	Add wording at the start of each section to clarify the status of the AIM wording.	Add wording in the opening paragraphs of Sections 6 & 8 to clarify that the following AIMs are community aspirations rather than policies.
POLICY EHSI – ENSURING HIGHWAY SAFETY	Add a second bullet point for circumstances where development is proposed within the South Downs National Park part of the Parish.	Add a second bullet point to state as follows: <u>“in the South Downs National Park part of the Parish appropriate levels of parking should be provided for any new developments in accordance with the parking standards in the South Downs National Park Authority Parking Supplementary Planning Document or any future version of those standards.”</u>
POLICY LGSI – LOCAL GREEN SPACES	Clarify whether Local Green Space, LGS SI: Shillinglee Road Junction Traffic Island is within or part within the South Downs National Park. Amend the related map to show the boundary of the South Downs National Park.	Contact the Planning Policy officer at the South Downs National Park Authority to confirm whether this Local Green Space is part within or wholly within the South Downs National Park. Amend the related map to show the boundary of the South Downs National Park.
Paragraph 9.3	Remove the wording relating to the South Downs National Park Authority (SDNPA) as the secondary authority. The wording is misleading in the context of this paragraph. SDNPA are the secondary authority for the Neighbourhood Plan process only with Chichester District Council as the lead authority. That is CDC are the lead authority in providing advice and guiding the Parish Council in developing the Neighbourhood Plan or any future review.	Amend first sentence, “...and the emerging South Downs Local Plan (SDNPA as the secondary authority).”

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	For planning decision making once the Neighbourhood Plan is 'made' (adopted), the key point is the location of the development, as either CDC or SDNPA will be the local planning authority as appropriate.	
Paragraph 9.4	Remove the wording at the end of the second sentence. The Basic Conditions that Neighbourhood Development Plans (NDPs) must meet have been changed through legislation in March 2026 enabling the commencement of section 99 of the Levelling Up and Regeneration Act 2023. The result is there is no longer a requirement in the Basic Conditions that an NDP be in conformity with the relevant Local Plan.	Amend the second sentence as follows: “...undertake a formal review on a five yearly or other basis conforming with the CLPKP and the emerging South Downs National Park Local Plan. ”