

## Liz Pulley

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**From:** Louise Diez <Louise.Diez@southdowns.gov.uk>  
**Sent:** 08 June 2018 14:18  
**To:** Neighbourhood Planning  
**Subject:** SDNPA comments for Boxgrove NDP submission  
**Attachments:** SDNPA response to Boxgrove NDP Submission 2018.pdf, SDNPA response to Boxgrove Submission NDP table.pdf

Please find attached comments from the SDNPA for the above Neighbourhood Plan.

Any queries, please do not hesitate to contact me

With kind regards

Louise Diez  
Planning Policy Officer

South Downs National Park Authority  
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08 June 2018

Boxgrove Parish Council  
By email

Dear Sirs,

**Subject: South Downs National Park Authority (SDNPA) submission version of the Boxgrove Neighbourhood Development Plan**

The SDNPA would like to commend the hard work and effort of the Planning group in the preparation of the Boxgrove Neighbourhood Development Plan (BNDP) and have the following comments.

**Page 5, 2<sup>nd</sup> paragraph, last bullet point**

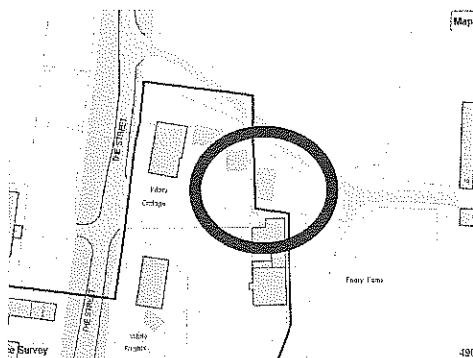
Refers to the SDNP Local Plan (due to be adopted September 2018) to refer just to the emerging South Downs Local Plan.

**Page 10, 2.1.2 Local Planning policy** Still refers to “the secondary of South Downs National Park”. Referring back to our response to the BNDP of 1<sup>st</sup> November 2017. It would better to describe the parish as falling within authority areas rather referring to the SDNPA as ‘secondary’.

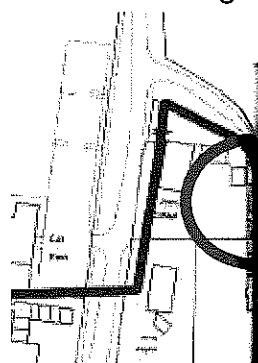
**Policy SBI Settlement boundary**

The settlement boundary for Boxgrove has been identified by Chichester Council to include three buildings running left to right along the adjacent lane. The plan, it includes four buildings. Please correct map so that it is consistent with the Local Plan.

Boxgrove Settlement Boundary differences:  
from Chichester DC

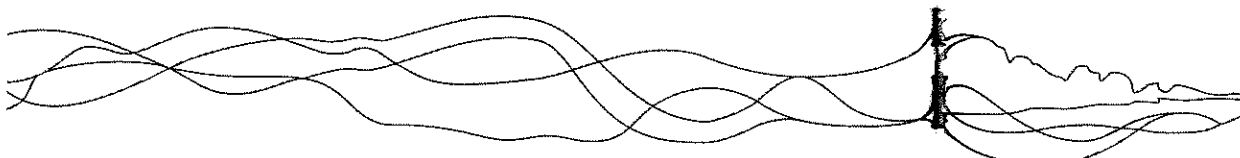


from Boxgrove



**Policy EHI Protection of trees and hedgerows, EHI.1**

The value of trees and hedgerows goes beyond an open and pleasant woodland are a significant asset with regard to ecosystem services for many supporting, provisioning, regulating, and cultural ecosystem services.



example carbon storage, biodiversity, air quality, and tranquility (Local Plan presubmission, 2017). Please add in their key roles in reducing the effects of a changing climate and biodiversity benefits.

#### **Policy EH5 Development on Agricultural Land**

SDNPA note the removal of the Agricultural grading map, however we refer to our letter responding to the Boxgrove Pre-Submission Draft of 1<sup>st</sup> November regarding safeguarding the most fertile agricultural land from development and to be in accordance to the NPPF.

#### **Policy EH6 Landscape character and important views**

It should be made clear that “positive ‘unlisted’ buildings” are also included in Appendix 3.

#### **Policy EH8 Landscape & Heritage Environment**

Landscape and wildlife have been included into a largely heritage related text that references to Landscape are kept within EH6.

#### **Policy EE2 Tourism**

Refers to the “built up area boundary” – suggest this should be an ancient boundary”.

#### **Policy GA4 Promoting Sustainable Movement**

SDNPA previously suggested that the section of the policy referring to cycle will be spent, may be better in the supporting text rather than the policy.

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

Yours faithfully,

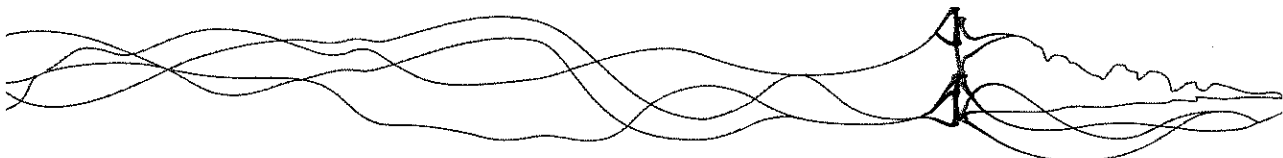
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## SDNPA response to Boxgrove Submission Neighbourhood Development Plan – table

All references to emerging South Downs Local Plan policies relate to the Pre-Submission Plan published on the 26 September 2017 rather than any subsequent revision (unless specified).

Comment number	Policy / para	Comment	Suggested change
1	Page 5, 2 <sup>nd</sup> paragraph	Page 5, 2 <sup>nd</sup> paragraph, last bullet point refers to the “SDNP Local Plan (due to be adopted September 2018)”	Refer simply to “the emerging South Downs Local Plan” without dates
2	Page 10, 2.1.2 Local Planning policy	“The Parish falls within the planning authority area of Chichester District Council and the secondary planning authority of South Downs National Park”	Describe the parish as falling within two planning authority areas rather referring to the SDNPA as ‘secondary’.
3	Policy SBI Settlement boundary, Map E, Page 57	The settlement Boundary - Map E for Boxgrove differs from Chichester District Council records	Please correct map so that it is consistent with Chichester Local Plan.
4	Policy EHI Protection of trees and hedgerows /EHI.1	EHI.1 Trees and hedgerows contribute to the open and pleasant feel of the Parish, its play areas and residential properties. The removal of trees to make way for development can change the character of an area and will require justification or adequate compensating replacement tree planting and habitat creation as part of proposals.	Please add in their key roles in reducing the worst effects of a changing climate and biodiversity benefits. e.g. “Trees and woodland are a significant asset with regard to ecosystem services, contributing to many supporting, provisioning, regulating, and cultural ecosystem services, including for example carbon sequestration, biodiversity, soil health and water quality”, <i>Emerging South Downs Local Plan Pre-Submission, 2017</i>
5	Policy EH15 Development on Agricultural Land	Proposals for development should safeguard the most fertile agricultural land from development and will be resisted unless it can be demonstrated that it would meet the following criteria: <ul style="list-style-type: none"> <li>• It supports the diversification of an existing agricultural enterprise or other land-based rural business;</li> <li>• The need for the development clearly outweighs the harm...</li> </ul>	The policy should accord with the NPPF

Comment number	Policy / para	Comment	Suggested change
6	Policy EH6 Landscape character and important views	"Any development that intrudes into the landscape character must be appropriate to the location in terms of its visual amenity. Particular places have been identified in the respective Conservation Area Character Appraisals and the Townscape Appraisal Maps (see Appendix 2 and 3)"	It should be made clear that positive 'unlisted' buildings are also identified on the map - Appendix 3
7	Policy EH8 Landscape & Heritage Environment	Landscape and wildlife have been included into a largely heritage related policy.	Keep references to landscape within EH6
8	Policy EE2 Tourism	Policy EE2 (Tourism) - refers to the "built up area boundary" – suggest this should be amended to "settlement boundary".	"built up area boundary" – should be amended to "settlement boundary"
9	Policy GA4 Promoting Sustainable Movement	Policy GA4 (Promoting Sustainable Movement) – we previously suggested that the section of the policy referring to how CIL money will be spent may be better in the supporting text rather than the policy itself.	Reword without the bullet point.