

STEDHAM WITH IPING NEIGHBOURHOOD PLAN

Regulation 14 Consultation

CONSULTATION RESPONSE FORM

About you

Your name:

Your email*:

Your address:

- Please tick all that apply to you:
- I live in the parish
 - I work in the parish
 - I have a commercial interest in the parish
 - I represent a voluntary organisation in the parish
 - I am a statutory consultee

Tick if you like to be kept up to date (by email) of the plan's progress

Tick if you would be happy for us to contact you about your consultation response

By providing this information to the Parish Council you are agreeing that we can use your information for the purposes of the Statutory Regulation 14 Consultation of the Stedham with Iping Neighbourhood Plan.

Comments on the neighbourhood plan

Using the boxes below, please provide your comments on the Regulation 14 Neighbourhood Plan. So that we can fully understand your comments please make it clear to what your comment relates.

Refers to...	Comment
<i>Eg: Page 3, para2</i>	
<i>Overall Plan</i>	<p>Thank you for consulting the Sussex Wildlife Trust on the Stedham with Iping Neighbourhood Development Plan (SINDP), we are very happy to give support to plan and congratulate the steering group on their work. Neighbourhood development plans give communities a great opportunity to formalise what it is about their local environment that they cherish and how they want the area to look in the future. In particular it provides a mechanism to ensure that existing wildlife areas are protected and enhanced, and that new wildlife areas that are important in a local context are identified.</p> <p>Whilst we support the plan overall, there are a few areas which we think could be</p>

	<p>strengthened. In some cases we have suggested amendments to wording, with proposed deletions struck through and proposed additions in bold text.</p> <p>Please do not hesitate to contact the Trust about any of our comments.</p>
Page 6, Vision and Objectives	The Sussex Wildlife Trust strongly supports the vision and objectives in the SINDP, in particular OB1, OB8 and OB12.
Page 10, policy SINDP2	<p>Given that the A272 corridor policy area runs over and adjacent to Iping Common SSSI, the Trust is concerned that the stipulation for evergreen screening within this part of the policy may be too specific. The suitability of screening should be informed by ecological information gathered as part of an application to ensure it is appropriate for the location. A high proportion of evergreen planting is unlikely to be appropriate in a heathland landscape. We would therefore like to see the wording of the policy changed as follows:</p> <p><i>'...This can be achieved, where necessary suitable, through the installation of additional planting to reinforce existing vegetation or through the planting of a new planted screen using indigenous species, of which a high proportion (over 60%) must be evergreen. The type of screening method proposed should be informed by suitable ecological and landscape impact assessments. Where planting is required through planning condition...'</i></p> <p>The Trust would be encouraged to see policies that promote the expansion and reconnection of remnant heathland in the neighbourhood plan area.</p>
Page 12 – 13, Recreational and Community Facilities	<p>The Trust questions the suitability of including Iping and Stedham Commons in policy SINDP3. We fully acknowledge that the commons are a valuable recreational resource for the community and do not object to the commons being labelled as a recreational and community facility. However it isn't clear how the content of the policy relates to the commons. In particular, the second paragraph of the policy does not seem applicable.</p> <p>We would also like to see consideration of the negative impacts that recreational pressure can have on the special features of the commons. If the commons are kept in the policy then perhaps there could be some acknowledgement of the issues with recreational pressure in paragraph 7 of page 12 along the lines of:</p> <p><i>'Iping and Stedham Commons are nationally important heathlands located in the middle of the Parish. These ancient areas are used by locals and visitors alike as valued open space. The rare wildlife found on the commons is vulnerable to inappropriate or intense recreational activity e.g. free running dogs during the bird nesting season and erosion of schedule archaeological monuments, and this must be considered when promoting the area for recreation'</i></p>
Page 17, policy SINDP7	The Trust strongly supports the inclusion of this policy and in particular criteria (iii) and (xii). However we question whether the requirement in criterion (iv) for the planting to be 'dense' is appropriate. As stated previously, the suitability of screening should be informed by ecological information gathered as part of an application to ensure it is appropriate for the location. We would be keen to see policy wording that encourages the restoration of heathland on and around the site and would be happy to provide support and advice on this to any landowner/applicant.
Page 18, policy SINDP8	The Trust strongly supports the inclusion of criteria (iii) and (ix) in this policy.

<p>Page 24, the Natural Environment</p>	<p>Given the highly valuable sites, habitats and species found within the neighbourhood plan area, the Trust strongly supports the inclusion of a section on the natural environment. However we are concerned that the SINDP does not contain a general policy on the natural environment/biodiversity.</p> <p>Whilst the National Planning Policy Framework (NPPF) does provide some protection for designated sites and habitats, this is caveated in most cases with language such as <i>'where possible'</i> meaning it does not guarantee that the natural environment is conserved. Additionally, the Government recently consulted on proposed changes to the NPPF. The revised wording if adopted, will significantly weaken protection for Local Wildlife Sites. Even if the changes are not adopted, this national review demonstrates that it can be risky to rely on national policy when thinking about the future of your local area. Similarly the South Downs National Park Local Plan is not yet adopted and may be amended during the Examination in Public. Local plans must also be regularly reviewed, which creates risk in terms of its environmental policies.</p> <p>It is clear that the preservation and enhancement of the natural environment is an important issue for the parish as demonstrated by the inclusion of objective 1 in the SINDP and the production of the Natural Environment Evidence Document. Including a general policy on biodiversity is the best way to provide certainty to local residents that any development will contribute to gains in biodiversity rather than losses.</p> <p>The following is an example policy that the Sussex Wildlife Trust has recommended for other neighbourhood plans in Sussex. We would support the inclusion of a policy along these lines being included in the SINDP:</p> <p><i>'The natural environment will be protected and enhanced by ensuring development:</i></p> <ul style="list-style-type: none"> • <i>Is informed by up to date ecological information and considers cumulative impacts</i> • <i>Safeguards the current biodiversity value of the site so that there is no net loss of biodiversity. Appropriate measures should be taken to avoid disturbance to priority species and habitats. If damage to biodiversity is unavoidable, this must be mitigated through ecological enhancements or, in exceptional circumstances, compensated for</i> • <i>Protects locally and nationally designated sites and those features they support</i> • <i>Contributes and takes opportunities to improve, enhance, manage and restore biodiversity, so that there is a net gain in biodiversity, including through creating new protected sites and locally relevant habitats, and incorporating biodiversity features within developments</i> • <i>Minimises habitat and species fragmentation, maximises opportunities to enhance, restore and connect natural habitats to increase coherence and resilience</i> <p><i>Developments of 5 or more houses will be required to produce an ecological management plan that ensures the effective long-term implementation and management of biodiversity features.</i></p> <p><i>Justification :</i> <i>Objective 1 of the Iping and Stedham Neighbourhood Development Plan</i> <i>National Planning Policy Framework sections: 109, 114, 118, 165'</i></p>
<p>Page 25, policy SINDP13</p>	<p>The Trust strongly supports the inclusion of a policy on Iping Common SSSI however we are concerned that the first paragraph of the policy conflicts with policy SINDP7 and SINDP8. The Stedham Sawmill and the Land west of West Lodge development sites both appear to be within 125m of the SSSI and therefore we are unsure how this</p>

	<p>policy can be adhered to.</p> <p>The Trust supports the list of possible mitigation measures listed in the second half of the policy and would be happy to work with any applicants to ensure that mitigation is appropriate and effective. Whilst the Trust acknowledges that recreational activity is an issue on the commons, we do wish to promote positive and responsible access to this special site.</p> <p>It could be useful to include a section on page 25 about the risks to heathland apart from recreational pressure. This could for example come before the second paragraph:</p> <p><i>'Lowland heathland is a nationally important habitat that has declined by over 80% in recent decades. It is threatened by development pressure, quarrying, forestry and invasion of scrub due to lack of appropriate management. Heathland is also particularly vulnerable to inappropriate or intense recreational pressure. Natural England have expressed concern that development near Iping Common SSSI has the potential to increase visitors to, and recreational activity on, the SSSI...'</i></p> <p>The Trust would also be happy to supply a photograph of the SSSI to be used in the plan that shows the heather and other special features for which it is designated.</p>
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Comments on the evidence base

The Regulation 14 Neighbourhood Plan relies on a number of evidence base documents to support the policies it includes. Please use the boxes below to provide any comments you may have

The Parish Economy

Refers to...	Comment

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The Natural Environment

Refers to...	Comment
<i>Overall document</i>	The Sussex Wildlife Trust is encouraged to see that the steering group has produced a background document on the Natural Environment to help inform the SINDP. This document clearly highlights how valuable the natural environment is within the neighbourhood plan area. Therefore as mentioned above, we encourage the steering group to translate this into policies within the SINDP which support the protection and enhancement of the natural environment.

<p>Page 3, Introduction</p>	<p>The last line/word appears to be missing in the introduction, it ends on '<i>enshrined in our...</i>'</p>
<p>Page 5,</p>	<p>We very much support detailed information about the SSSI being included in the evidence document, however some of the content is a little out of date. For example the following text could be added to paragraph 5 on page 5 to update the information:</p> <p>'Since the citation was revised many more rare species of invertebrates have been recorded and two species have been reintroduced to the site as part of the species recovery programme.'</p> <p>We would also support an additional paragraph regarding the importance of the remnant heathland elsewhere in the neighbourhood plan area. Concerted effort is being made through the Heathlands Reunited project to restore and connect these smaller areas of heath in order to create heathland corridors throughout the landscape. The SINDP could support this ambition and have a role in achieving it through promoting habitat creation in association with development.</p>
<p>Page 6, paragraphs 4 - 6</p>	<p>We'd also like to see the following amendments on page 6:</p> <p><i>'...The majority of the heath is dominated by heather and bell-heather Erica cinerea with dwarf gorse Ulex minor also present. Where drainage is impeded on north Trotton, and parts of Stedham and on the South-East of Iping Commons this dry heath grades into a wetter heathland type where an increase in cross-leaved heath Erica tetralix and purple moor-grass Molinia caerulea is found. Where surface water is permanently present purple moor-grass becomes dominant with deer-grass Trichophorum cespitosum and heath rush Juncus squarrosus locally abundant. These areas of wet heath also support a rich moss flora which includes Polytrichum commune, Sphagnum tenellum and Dicranum spurium. The uncommon sundews, Drosera intermedia and D. rotundifolia are found in the wet and bare peat areas, along with the Nationally scarce Marsh club-moss, Lycopodiella inundata.</i></p> <p><i>Grassland is mainly confined to the rides which cross the site and to the west of Trotton common where wavy Hair grass, Deschampsia Flexuosa dominates. Creeping and common bent grasses, Agrostis stolonifera and Agrostis capillaris respectively, dominate drier areas; purple moor-grass and soft rush Juncus effusus on wetter areas. Iping Common SSSI is the only Sussex site for bristle bent grass Agrostis curtisii, a record not verified recently with the species being recently recorded on both Iping and Stedham Commons.</i></p> <p><i>The site supports a rich invertebrate fauna. Prior to the fires of 1976 109 spider-species (Arachnida) had been recorded, including such notable rarities as Centromerus aequalis a species new to Britain, Micaria silesiaca and Prosopotheca corniculans. The total spider count is now up to well over 200 species with the commons being one of the best sites for spiders in Sussex. Amongst the butterflies there were important local populations of the silver-studded blue Plebejus argus and the grayling Hipparchia semele. Whilst the silver-studded blue population is still doing very well, the grayling has not been recorded since 1988 which reflects national declines in the species. The dragonflies Odonata were also well-represented. Since the re-introduction of the Heath Tiger Beetle, Cicindela sylvatica, Iping is the only site in Sussex for this endangered species. It relies on bare sandy ground (as do 60% of heathland species)...'</i></p>
<p>Page 7, paragraph 2</p>	<p>The Sussex Wildlife Trust owns most of Iping Common, only leasing a small area. Therefore we would like to see paragraph 2 amended as follows:</p> <p><i>'The land in the LNR and in the SSSI is under the management of Sussex Wildlife</i></p>

	<i>Trust (SWT) which owns the larger part of Stedham Common and has a long lease on most of Iping Common, with a long lease on a small area. SIPC works closely with SWT and is represented on the LNR Management Advisory Committee'</i>
<i>Page 7, paragraph 4</i>	<p>There is a typo in relation to the state of the three SSSI units, it should say 'condition threat risk of...' rather than 'condition risk threat of...'</p> <p><i>'Stedham Common – Favourable condition, with a condition risk-threat risk of high Iping Common – Unfavourable-recovering condition, with a condition risk-threat risk of medium Fitzhall Heath – Unfavourable-recovering condition, with a condition risk-threat risk of medium'</i></p>
<i>Page 8, paragraph 6</i>	<p>The information regarding the protection of LWS's through Planning Policy Guidance 9 is out of date. This guidance was revoked when the new National Planning Policy Framework (NPPF) was adopted in 2012. LWS still do not have statutory protection, but they should be considered through the planning process. The NPPF currently states in paragraph 113:</p> <p><i>'Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.</i></p> <p>And further in paragraph 117: <i>'To minimise impacts on biodiversity and geodiversity, planning policies should:</i></p> <ul style="list-style-type: none"> <i>• Identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation'</i> <p>We therefore recommend that this section of the evidence base document is updated to reflect the current planning policy.</p>

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The Settlement Boundary

Refers to...	Comment

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A review of heritage assets

Refers to...	Comment

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Getting Around – Transportation and Accessibility

Refers to...	Comment

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Assessment of Potential Development Sites

Refers to...	Comment

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A review of open spaces and views

Refers to...	Comment

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