

## **SOUTH DOWNS LOCAL PLAN REVIEW – REGULATION 19 REPRESENTATION**

### **OBJECTION TO ALLOCATION SDA51 (LAND SOUTH OF FINDON / WYATT'S FIELD)**

I write to strongly object to the inclusion of site SDA51 in SDNPA's Local Plan on the following grounds:

Until the Regulation 19 stage the South Downs National Park Authority (SDNPA) considered the site (referenced as AR022 in successive Land Availability Assessments) to be unsuitable for allocation. The SDNPA's own evidence demonstrates that the principal constraints affecting the site have remained unchanged since at least 2016. AR022 was assessed and evaluated for both the current local plan (in 2016) and at earlier stages of the submission plan process including a review of sites in 2024. The 2024 assessment identified a number of significant constraints, including:

- high landscape sensitivity;
- the site's contribution to the setting of the Nepcote Conservation Area;
- the historic relationship between Nepcote and the surrounding open countryside;
- the site's contribution to local tranquillity;
- the importance of the field as the last remaining open field in this part of the village; and
- the adverse effect that development would have on local landscape character.

No reason has been offered for the change in its position between Regulation 18 and 19 stage. The inclusion of SDA51 in the submission plan is therefore not **justified**. Equally importantly, on the SDNPA's own judgement over many years it is not a deliverable site because planning consent is unlikely to be achievable.

SDA51 has been added to the submission plan without having been subject to any prior consultation. Whilst the late introduction of a new site or a site with significantly changed circumstances may be allowed by local plan regulations, the exact same site was considered and determined as unsuitable for inclusion in both the current local plan and at earlier stages of the submission plan. It has appeared at Regulation 19 stage with no explanation as to how it has suddenly become acceptable. Local residents and other interested parties did not have the opportunity during Regulation 18 to comment on the allocation of this site, its suitability for development, or the proposed amendment to the settlement boundary associated with it. No opportunity was given to question how a site which had been rejected for inclusion in the previous plan or for inclusion in the current document (as late as Regulation 18), had suddenly become suitable for development.

Development of the site would result in harm to the historic, landscape and cultural character of Findon. Based on other policies in the emerging plan and the new National Decision Making Policies it is highly likely that any planning application which came forward on the site would be refused.

The provision of up to 20 dwellings on site SDA51 makes a negligible contribution to meeting housing need. The SDNPA has taken a site led approach to housing delivery,

finding several hundred 'available' sites unsuitable for inclusion in the submission plan. Removing SDA51 would be consistent with that approach and would have no material impact on the objectives of the submission plan.

The 2025 assessment found the site was found to have a high landscape sensitivity. It continued to be noted as an important component of the setting of the Nepcote Conservation Area. Its contribution to the rural setting of the village remained acknowledged. The same characteristics and constraints were identified and there has been no other change in relevant policy context.

The significance of this change is increased by the fact that Wyatt's Field remained outside the settlement boundary under both the adopted Local Plan and the Regulation 18 consultation draft. The allocation of SDA51 therefore requires not only the allocation of a new housing site but also an extension of the settlement boundary into open countryside south of Nepcote.

No explanation is provided or ever has been provided which explains or justifies this change. The constraints affecting the site now are the same as those that led the SDNP to reject the site as unsuitable for inclusion in the previous plan and at Regulation 18 stage.

**The inclusion of the site in the submission plan is not justified and as a result the plan itself is unsound.**

### **The Proposed Site is outside of the Settlement Boundary**

The site occupies a prominent position on the edge of the settlement and forms part of the transition between the village and the surrounding countryside. It contributes to the openness of the settlement edge and helps maintain the historic relationship between Nepcote and the surrounding open countryside.

The existing settlement edge is characterised by an informal and irregular relationship between built development and open downland. This reflects the historic evolution of the village and contributes positively to its distinctive character. The allocation would replace part of this informal edge with a more urbanised and regularised settlement boundary. Whilst this is sometimes described as "rounding off" a settlement, the informal and meandering relationship between settlement and countryside is itself an important characteristic of downland villages.

This longstanding relationship between settlement and countryside is reflected in successive development plan boundaries, all of which retained Wyatt's Field outside the settlement boundary until the allocation of SDA51 appeared in the submission plan.

The site is visible from public rights of way and elevated viewpoints on higher ground to the east and west of the village. From these locations the field forms part of the wider landscape setting of Findon and contributes to the way in which the village is experienced within the National Park.

The site contributes to the distinctive equestrian character of Findon. The Findon Neighbourhood Development Plan identifies horses, grazing paddocks and equestrian activity as important elements of local distinctiveness. SDA51 has long been used as grazing land and forms part of the paddock landscape that contributes to this character.

What is the point of settlement boundaries if the National Park ignores them as they have done for sites SDA 51 and SDA 49 – Land South of Soldiers Field House and just extends them when a development is being offered.

### **Highway Access**

A further concern which appears not to have been considered at all by the SDNPA relates to access from the highway.

The site requires access from Cross Lane which is a narrow rural lane characterised by mature boundary vegetation, hedgerows, banks and constrained road widths. Despite these constraints, no consideration appears to have been given to highway access, visibility splays, engineering requirements or other technical evidence to demonstrate that a safe and suitable access can be achieved. Given these constraints, it is unlikely the site would be deliverable.

### **REMOVAL OF SDA51 WOULD HAVE NO ADVERSE EFFECTS**

As the SDNPA acknowledges, the submission plan provides for sites in excess of the identified housing requirement for the plan area and includes a degree of flexibility and headroom. Some contingency may be appropriate, but that will not be achieved by including undeliverable sites. It is therefore not necessary for SDA51 to be included for this purpose and could actually be counterproductive by leading to increased targets in the future as the Park over-delivers.

The allocation is not justified by any identified need for housing in or around Findon that might overcome policy objections to the development of the site. It plays no strategic role nor is its contribution to housing delivery significant. Its inclusion in the submission plan is not necessary and it can be removed without any knock on consequences or adverse effects.

(submitted by West Sussex County Council Cllr Urquhart)