

<i>rep</i>	<i>from</i>	<i>response</i>
1	Gerry Plummer_Atlanta/Mayland	Not proposed as an allocation site, inside settlement boundary, LP presumption in favour of housing development subject to access, scale, neighbour amenity considerations, will contribute to LP housing 'windfall' numbers if consented.
2	Linda Martin_Quadrangle	<ol style="list-style-type: none">1. NP referendums are carried by simple majority vote, the housing preference surveys results show significant support for the sites at the south west end of Findon. A democratic approach would find it hard to justify a smaller residents group preferences outweighing the preferences of larger residents groups in the village. However the weight given to local preferences for housing locations are only one of the considerations which inform housing site allocations, local landscape and cultural heritage value, impact on historic rural roads, desirable walking distances to village facilities and bus stops, potential to provide community benefits also carry equivalent weight.2. The UNP is in conformity with strategic policies in the Submission Local Plan. The LP does not include a Local Gap policy like the previous Arun DC 2003 LP but the strategic landscape policies seek to retain green gaps between settlements to prevent 'coalescence'. The 2016 NP Examiner considered that the NP policy to retain the Local Gap, without a review of its extent, was not sound as it would potentially prevent the SDNPA as LPA from allocating some housing at the south west end of the village and it was therefore removed to the separate NP 'Aspirations' document. The UNP has undertaken a review of the extent of the Arun 2003 'broad brush' local gap and retained that part of it which actually provides a green gap between the south west end of Findon and Findon Valley as a local green gap, but no longer includes the garden centre site and former private allotments which are part of the south west end of the village.3. The UNP is in conformity with strategic landscape policies in the Submission LP. The sites at the south west end of the village are located at the dry valley bottom of Findon, unlike the proposed LP allocation sites which are 25 to 30 metres higher up the downland slopes and are therefore less landscape sensitive. The

UNP evidence base will include local landscape character assessments for the two sites using the SDNPA published methodology for preparing LCAs.

4. The Allotment Act applies to 'statutory; allotments, not private allotments.
5. LPAs and Parish Councils duty to provide allotments only applies where there is a local need and where it 'reasonably practicable' to acquire the land. If a private landowner does not wish to sell the land at an allotment value, it would not be considered 'reasonably practicable' for an LPA or Parish Council to compulsorily purchase the land at a higher value. The UNP allocation policy for the site however seeks to ensure that up to 10 restored allotments are provided as part of the housing development with the allotments being transferred to Findon Parish Council.
6. These issues, disturbance, overlooking, loss of privacy are considered in detail at the planning application stage and can often be mitigated by thoughtful design and landscaping. These issues are not so relevant at the housing policy allocation stage unless the impact would be overwhelmingly detrimental.
7. The CPRE often lobbies the government about the risks of housing development in the countryside and at the edge of settlements. It is central government who decides the nations housing priorities and LPAs are required to allocate sites to meet these governments targets, so lobby your local MP on this one.
8. These are matters that the UNP Independent Examiner will review. The examiner will look at all representations on the Reg 14 and Reg 16 UNP Submissions.
9. It is an unfortunate misconception that any of us have a right to a view. It is not a right in planning law, and therefore not a material planning consideration.
10. As Lead Local Flood Authority WSCC suggest that development is avoided near the eastern boundary of HD10 and the south west corner of HD11 and include flood projection maps. The allocation policies will include this advice in the policy text and the masterplan has already taken this into account in the illustrative positioning of access roads and gardens. Parts of the Quadrangle itself are at greater risk of flooding according to the WSCC maps and there may be the opportunity to reduce this existing risk to the Quadrangle by introducing 'suds' type drainage measures as part of on the former allotments site housing development.

11. The SDNPA have concluded in the Submission Local Plan that there are no sites available within the current Findon settlement boundary that have the capacity to provide the LP housing provision for Findon of around 30 dwellings and have allocated two sites outside the settlement boundary in the LP. The UNP argues that there are different, less landscape sensitive sites outside the settlement boundary which are available, deliverable and have significant local support.
12. The Neighbourhood Plan Regulations give guidance on the extent of local consultation that should be carried out before housing sites are allocated and this has been followed by the UNP Working Group. The WG are committed to allocating housing sites at locations which will cause the least harm to the more sensitive landscape, the cultural heritage and the historic rural roads of Findon while taking account of residents preferences. The WG use their best endeavours to bring the whole community around to that approach, although appreciating that it is unrealistic that everyone will be able to accept this approach.
13. The private allotments are not 'a designated planning use, they are noted as that on Ordnance Survey maps. The planning use is agricultural and while planning policies seek to protect the countryside, every 15/20 years planning authorities are required to review their local plans to ensure that sufficient land can be allocated for housing to meet government targets. This inevitably means that some land classified as agricultural, particularly at the edge of settlements but usually not the highest grade agricultural or highest landscape quality land, is allocated for housing. Remember the UNP allocation policy for the site however seeks to ensure that up to 10 restored allotments are provided as part of the housing development with the allotments being transferred to Findon Parish Council.
14. WSCC have been consulted and as the highway authority consider that the Quadrangle cul de sac road has the capacity to cope with the proposed new housing development. FPC and the UNPWG have lobbied WSCC to carry out a traffic speed survey on the A24 to see if a reduction to a 40 mph speed limit is possible within DfT and Sussex Police rules for alterations to speed limits. The speed survey has now been carried out and the data and results are due to be released soon. The Quadrangle road is not a statutory 'historic rural road' like Nephote, Nephote Lane, Cross Lane, Steep Lane and Stable Lane which have

some protection from the impact of housing development where these lanes would be used to access the A24.

15. Improving the connectivity with the main part of the village is a key part of the allocation policies both in terms of new footpaths and a designated crossing point near the garden centre access shared with equestrians. These are included in the masterplan aspirations for the south west end of Findon in the UNP.

3 The Pelling Family_Old Cottages

The allocation policy for HD13 includes a requirement for full on site parking to avoid any impact on the the roads nearby where there is a shortfall of both on site parking and on road parking.

The allocation policy for HD12, by allowing an element of market housing in an essentially affordable homes scheme will provide Arun DC with the funds from the land value of the market housing element to introduce additional parking in and around the Oval, Old Cottages and the approach to Nightingales. Using any significant part of the green area of the Oval as one possible area for additional landscaped parking is not overly popular but the UNP Working Group are confident some additional on road parking space can be formed in and around this part of Findon and will consult further on locations.

The allocation policy for HD12 includes a requirement for full on site parking, replacement and additional parking for Nightingales to avoid any impact on the approach road to Nightingales where there is a shortfall of both on site parking and on road parking.

4 Anne Martin_Stable Lane

The SDNPA Local Plan housing site allocation SD71 at Elm Rise has been rejected as a housing allocation site in the UNP on local landscape harm and local cultural heritage harm. The UNP Working Group and FPC are making oral submissions at the Local Plan Inspection Hearings in December to argue the case that the SDNPA housing allocations are not sound and should be removed from the Local Plan.

5 Peter Leach_Land east of Pony Farm

Detailed response to follow review of outcome of planning appeal on refusal for a very large house and landscaped grounds. Little support in UNP housing preferences survey, no acceptable solution to narrow access proposed, site has cultural heritage value, part of a network of working paddocks at eastern settlement edge of Findon

mischievously neglected and partly overlain with imported road scalplings, concrete and builders rubble.

6. Southdowns Society
Unfortunately their planning and policy officer has retired and has not yet been replaced. Unable to make a representation.
7. Natural England
The UNP housing allocations meet the LP housing provision with a modest buffer. SDNPA have confirmed that the UNP allocations do not conflict with para 172 of the NPPF or would be considered 'major development'. The UNP Working Group will continue to liaise with the SDNPA on the housing provision and allocations.
8. Environment Agency
No detailed representations considered necessary. No response required.
9. MH Architects_Nightingales site
Mark Coates_Arun DC
Relatively minor amends to the HD12 allocation policy text sought on extent of prescription on noise control methods, the requirements for the off site parking survey and extent of the existing shortfall. The UNP Working Group aspirations are to facilitate high standards in design and specification so reluctant to relax policy requirements but will reword text to be less method prescriptive. The local community around the Oval, Old Cottages and Nightingales clearly experience parking space shortfalls and any survey undertaken should be able to establish the extent of the shortfall. No change in the parking survey and implementation requirements in the policy are proposed. However the UNP Working Group recognise the commitment of Arun DC to bring forward predominantly affordable housing on the site and are confident agreement on the parking survey requirements and implementation can be reached at the planning application stage.
10. SDNPA
Report: see response at end of this document
Update: noted, no response needed
Comments: see responses at end of this document
Legal Opinion: see response at end of this document
11. Charles Costello_Paddock Way LGS
The green space has special local historic value in its continuity with this 19C part of rural Findon, its contribution to the approach and setting of the former Nepcote Lodge Stables and the racehorse training heritage of Findon. It also has special local

landscape value making an important contribution to the 'sylvan setting' * of Nephcote Lane, a designated 'historic rural road'.

It is special to the local community, an identifiable green space and therefore sufficiently meets the strict criteria for designation as a local green space set out in the NPPF. This is a clarification following a review of the LGS designation in the 2016 'made' NP, the space therefore is, and remains a designated LGS.

* Planning Inspectors description from dismissed appeal on 1 Paddock Way.

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| 12. | Gillings LLP_Soldiers Field House | See FPC and UNPWG Position Statements to the LP Inspection Hearings, which present the case that allocation SD72, Soldiers Field House is insufficiently sound. |
| 13. | Luken Beck_Land at Elm Rise | See FPC and UNPWG Position Statements to the LP Inspection Hearings, which present the case that allocation SD71, land at Elm Rise is insufficiently sound. |
| 14. | Henry Adams_HD10,HD11 | Support for allocations, no response needed. |
| 15. | Henry Adams_Land at Soldiers Field Stables | Recent planning application for stable complex, barn, holiday cottage and part of replacement house refused by SDNPA. Site is high landscape sensitivity and value and of cultural heritage value as part of a network of paddocks associated with racehorse and eventing horse training facilities at the adjoining Soldiers Field Stables. Rejected at the landscape first assessments carried out during the preparation of the UNP. No justification to change the assessment. |
| 16. | Historic England | Confirmed the proposed allocation sites do not contain designated heritage assets. Historic Environment records held by WSCC have been checked and don't suggest any potential for architectural finds on the allocation sites. This will be stated in the Reg 15 version of the UNP.
The potential impacts of other possible site allocations on the settings of non designated local heritage assets, listed buildings and the Conservation Area have been taken into account in the reasoning for rejection, particularly of the Submission LP proposed allocation sites SD71 Land east of Elm Rise and SD72 Soldiers Field House. The LLCAs which will be included in the Reg 16 UNP Evidence Base include reference to local heritage assets, local historic landscape and local cultural heritage. |

An SEA screening assessment has been carried out by the SDNPA and confirms that an SEA is not required for any of the proposed allocation sites.

17. Highways England
Highways England is satisfied that the proposed housing allocations will not materially affect the safety, reliability and/or operation of the Strategic Road Network (SRN). No response needed.
18. WSCC Highways
Now in representation 21.
19. Nicla Snowden_Quadrangle
 1. No response needed.
 2. WSCC, the highway authority, have confirmed that the Quadrangle access road has the capacity to accept the traffic flows from the proposed housing development at the former private allotments site. The UNP Working Group however are aware of the existing difficulties when trying to access the A24 from the Quadrangle. FPC and the UNPWG have successfully lobbied WSCC Highways to carry out a traffic speed survey on the A24 to see if a reduction to a 40 mph speed limit is possible within DfT and Sussex Police rules for alterations to speed limits. The speed survey has now been carried out and the data and results are due to be released soon.

The UNP also includes a masterplan for the southwest end of Findon which includes aspirations for a pedestrian/equestrian crossing near the garden centre access and a peak time traffic light controlled junction at the Quadrangle junction with the A24. As these are matters that are the responsibility of the highway authority the UNP Examiner will not allow the crossings/traffic lights to be embodied as a UNP policy but will allow them in a separate UNP aspiration document.

All near misses and incidents at the A24 junction with the Quadrangle should be reported on line to WSCC as the highway authority gives weight to this data when considering highways improvements.
 3. The Acting Lead of UNPWG is seeking clarification from George Lister on this matter although from a review of Land Registry title plans, the masterplan and allocation sites do not need any Lister land for their implementation.
 4. The proposed housing allocation is only for half the area of the paddock to the immediate south of the garden centre buildings, in the event that a replacement

garden centre is found to be financially viable. If a new leaseholder for a replacement garden centre, or the existing garden centre does not come forward within two years of the garden centre being marketed, and no alternative rural enterprise comes forward with a viable proposal, the housing allocation will revert to part of the garden centre site. This is stated in the supporting text to the allocation policy.

The UNP does not seek to protect all paddocks outside the settlement boundary when land has to be allocated to meet the housing provision for Findon set out in the Submission Local Plan strategic policies. The priority for the protection of paddocks is first, those on the higher valley slopes that are particularly visible in the downland setting of Findon, second, those that are 'working' paddocks important to local equine based businesses that maintain continuity with this local cultural heritage, thirdly those that have local historic landscape value by providing a readable memory on the ground of the earlier rural 19C character of Findon.

5. The 'Findon Gap' is a Local Gap, in planning terms, that has not been reviewed since the 2003 Arun Local Plan was adopted. The new SDNPA LP does not include a Local Gap policy like the previous Arun DC 2003 LP but the strategic landscape policies seek to retain green gaps between settlements to prevent 'coalescence'. The 2016 NP Examiner considered that the NP policy to retain the Local Gap, without a review of its extent was not sound as it would potentially prevent the SDNPA as LPA from allocating some housing at the south west end of the village and it was removed to the separate NP 'Aspirations' document. The UNP has undertaken a review of the extent of the Arun 2003 'broad brush' local gap and retained that part of it which actually provides a green gap between the south west end of Findon and Findon Valley as a local green gap, but no longer includes the garden centre site and former private allotments which are part of the south west end of the village.
6. The SDNPA LP has policies to protect wildlife and there is national legislation which gives protection to some species including the adder and some newts. The SDNPA wildlife assessments have not highlighted a habitat at the allocation site(s) that is likely to support these species so it is not considered a policy constraint. However any planning application will be required to include a local wildlife survey and report and if any protected species are found to inhabit the

site the applicant will be required to follow a wildlife consultants recommendations to create a supportive habitat elsewhere on the site or nearby.

20. WSCC Estates
- Objection to designation of school playing fields as Open Space or Green Space and the school as a local community asset. These designations are already in the 2016 'made' NP and there is no meaningful justification to review the designations in the UNP. These designations would not prevent the Education Authority altering or enhancing the playing fields if it was clearly for the benefit of the school and the community. Planning consent can be granted for alterations and enhancements to designated open spaces and designated local green spaces in special circumstances. The designations are important to the made NP and the UNP which does not propose to amend them. as they offer protection to the playing fields and the school should the Education Authority come under financial pressure to sell part of the playing fields for development or the Diocese similarly come under financial pressure to sell the school for conversion or redevelopment.
21. WSCC Highways
- WSCC have no over riding concerns about the transport impacts of the updated NP. They will give site specific advice on access design, parking and other transport matters at either the pre planning application advice stage or planning application stage.
- As Lead Local Flood Authority they suggest that development is avoided near the eastern boundary of HD10 and the south west corner of HD11 and include flood projection maps. The allocation policies will include this advice in the policy text and the masterplan has already taken this into account in the illustrative positioning of access roads and gardens.

Update A

10.1/10.2 SDNPA Committee Report/Update

These summarise the representations made in 10.3 and 10.4 below. The Working Group response are given under these headings below.

10.3 SDNPA Comments

p8, p9, p10, p11, p12, p15-p17, p18, p19-p21, p22, p29, p30, p31, p34, p35. p38, p39, p40, p41, p42, p43, comments are accepted.

Most of the reps apply to the 'made' NP as well as relatively minor referencing in the UNP. The opportunity afforded by the preparation of the UNP will be taken to address these comments in the UNP.

p44_ The LP Inspector has not included any observations on the challenges that may arise if the UNP continues to propose different site allocations to those in the Local Plan, in his published 'major modifications'. These challenges are considered in the Working Group response to Representation 10.4, the SDNPA legal opinion.

p45 accepted,

p46 accepted will check with Arun DC the housing authority.

p46 (Live Work Units) accepted

p49 accepted, the Working Group will discuss any amendments that may be needed to the Village Design Statement with the SDNPA for its consideration as an SPD. This itself need not impact on the UNP as the VDS, amended or not, will be included as a full appendix to the UNP (more easily accessible for applicants bringing forward development proposals in future than researching the Evidence Base)

p50 policy HD9 Masterplan_The SDNPA did not have a 'major in principle' objection regarding the scale and location of development of up to 50 houses in this location in 2015 when the SDNPA itself suggested this location to FPC for housing

during the initial stages of the emerging NP. The FPC objection to the SDNPA proposal at that time was the potential loss of the garden centre itself as a local employment site. The Masterplan location includes the garden centre, part of the adjoining leisure paddocks (in the same ownership) and the adjoining overgrown, long ceased, former private allotments site, with a significant garden centre facility retained.

There is no significant change to settlement form or an extension of the built form towards Worthing (Findon Valley) arising from the Masterplan. There are more than 50 houses on the western side of the A24 as well as the garden centre, they are within the village of Findon and signed as such on the A24 immediately to the south of the Masterplan location. The proposed allocation sites are to the north and part to the west of the existing Quadrangle houses, between this developed edge of Findon and the rest of Findon and do not extend the settlement form towards Worthing (Findon Valley).

The UNP recognises the importance of avoiding coalescence between settlements and maintaining the local, distinctive character of settlements and is in conformity with LP Strategic Policy SD4: Landscape Character. The 'Local Gap' between Findon and Findon valley was removed from the original NP by the Examiner and retained only as an aspiration in a separate 'non policy' document as its retention in the NP was considered by the Examiner to be an unnecessary constraint on the SDNPA's ability to consider sites for housing allocation in Findon.

The Local Gap derives from the 2003 Arun DC LP and has not been reviewed since then and may be considered to be an out of date policy, until reviewed. The SDNPA LP does not include a specific local gap policy, relying on strategic policy SD4:Landscape Character, but does encourage NPs to include local gap policies, where appropriate. The Working Group have reviewed the Arun DC LP Local Gap which was a 'broad brush' designation which included all 50 houses, garden centre, Lister paddock, former private allotments site as well as other land parcels on the eastern side of the A24 between Nephote and Findon valley.

A more 'fine grain' approach was taken by the Working Group which focussed on the key purposes of the designation of local gaps, being to avoid coalescence and maintain the distinctiveness of settlements, in line with the NPPF. A revised extent (area) of the Local Gap, which meets these key purposes is to be included as a policy in the UNP, in effect 'recovering' the 'policy' from the separate aspirational NP document and giving additional protection to the Local Gap (as modified) between Findon and Worthing (Findon Valley). The area of the modified Local Gap no longer includes the Masterplan locations, precisely because they lie between the Quadangle houses (in Findon) and the rest of Findon and do not lie between the Findon settlement and Worthing (Findon Valley).

The Masterplan location should also be contrasted with LP allocation sites SD71 and SD72 in relation to the characteristic open downland landscape which has the highest landscape sensitivity and landscape value at Findon. The Masterplan location is a (dry) valley bottom, well screened from the A24 by mature indigenous trees and hedges. LP Allocation sites are more than half way up the valley sides (30 metres or 98 feet higher than the valley bottom and the High Street), are highly visible in the open downland landscape where the open downland runs directly into the sites.

Further, the Masterplan location is close to the A24, well connected to bus routes and within an acceptable 10 minute walking distance of Findon High Street, the Black Horse and a small parade of local retail and leisure facilities. Vehicle access to the Masterplan location does not require cars, vans or trucks to use the narrow, sunken, soft landscape edged, unlit 'historic rural roads' in Findon, unlike the LP allocation sites where vehicle access does require use of these 'historic rural roads'. This will cause significant harm to 'already at risk' roads which need regular maintenance and soft edge repair by FPC volunteers. The racehorse training and other equine based businesses in Findon, which have significant heritage, economic and social value to the settlement also regularly use these 'historic rural roads' to reach training gallops and stables where conflict between working riders, other equestrians and vehicles will only be exacerbated with the traffic impact arising from the LP allocation sites.

The Masterplan location and site allocation policies also provide the opportunity to deliver community benefits from the development, in particular some restored allotments, a contribution towards a more sensitive vernacular design for a replacement garden centre and enhanced pedestrian, cyclist and equestrian connectivity with the main part of Findon on the other side of the A24.

There are no aspirational aspects to the Masterplan that will affect the delivery of the two allocation sites within the first five years of the UNP or LP period. Both allocation sites can be independently accessed via existing roads from the A24. The proposed linking road between the two sites is a connectivity enhancement that need not become a highway adoptable or funded road or footway. The aspirational reduction in speed limit to 40mph on this part of the A24 is already in progress, WSCC Highways having undertaken a traffic speed survey, the results of which allow them to bring it forward for approval at one of the 2019 JEAC committees with implementation recommended in the 2020/21 Highways Improvement Delivery Programme. The 20mph speed limit within Findon was implemented in 2018.

p53 HD10_ The site is the northern part of the leisure paddocks (as opposed to a working paddocks essential to the heritage equine businesses in Findon), adjacent to and in the same freehold ownership as the garden centre. The SDNPA SHLAA considers landscape sensitivity to be medium to high (same as LP allocation SD71), does not clearly identify any landscape value but concludes that the landscape capacity to absorb development is low. The landscape sensitivity assessment however derives its rating from the assertion of a 'poor relationship to the existing settlement in terms of access to local services and does not fit well with the settlement form as currently exists'. These two assertions have been challenged in detail in the Working Group comments on the SDNPA representations on the Masterplan (p49 above).

The Working Group have also undertaken and published a more fine grained local landscape characterisation study for Findon and this considers that site HD10; in part due to its valley bottom location, mature landscape screening, lack of visibility in open downland and lack of local heritage and local historic landscape significance; has a medium landscape sensitivity, low to medium landscape value, is better connected to the valley bottom settlement of the main part of Findon than allocation

sites on the upper slopes and therefore has a medium to high landscape capacity to absorb development.

The allocation does not conflict with Policy ES1 in the NP because the extent (area) of the Local Gap has been reviewed and modified in the UNP and a new modified map is included in the UNP (and is deleted from the Aspirations document associated with the NP)

Part 2 of the policy aims to plan for 'relatively near' future circumstances where the garden centre, or a replacement garden centre, or an alternative employment use, may be evidenced to be not economically viable, after complying with the marketing requirements in such cases, in the LP and the NP. In that event the UNP allocation would 'revert' to the garden centre site, being adjacent, with the same access, a similar landscape capacity to absorb development and in the same freehold ownership. This is a reasonable approach as the current garden centre lease expires in 2023 and has been for sale in the open market for nearly a year already without any meaningful interest to date. The Working Group accept however that the text of Part 2 lacks some clarity and will review and amend this to offer full clarity in the Reg 16 Submission.

p57 HD11_ The SDNPA representations are very similar to those related to HD10 and the Working Group refer their comments above on HD10, to HD11. The fine grained local landscape characterisation study identifies a medium landscape sensitivity, a low to medium landscape value and low local heritage and historic landscape value, which would therefore not conclude that development on the site would have a potential adverse impact on the character and appearance of the landscape. The SDNPA representations also do not recognise the fine grained elements in the allocation policy with its requirements to enhance and indigenously infill (in places) the existing mature landscape screening to the A24 and the inclusion of restored allotments between new housing and the A24 existing landscape screening.

p61 HD12_ The SDNPA representations appear to conflict with the pre application given to Arun DC, the owners of the site, and the SDNPA view that the site may have

scope to come forward as a rural exception site. Rural exception sites also have to consider the development impact on the landscape and demonstrate that there is no, or limited potential for harm and that the development of the site would not have a potential adverse impact on the character and appearance of the landscape. If HD12 has scope to come forward as a rural exception site it has scope to come forward as an allocation site, in landscape assessment terms.

The SDNPA representations appear to overlook the reasons behind the mitigation measures included in the policy. These measures will properly address the existing amenity issues for future occupants and deliver high quality new homes, with a higher proportion of affordable homes than would be required under the LP housing policies. The mitigation measures in the policy will impose additional costs on the development which however will be able to be absorbed by Arun DC, as developer, if the site is a UNP allocation, because that will allow two or three of the houses to be sold as market houses to generate the funds for the mitigation measures.

Arun DC support the housing allocation. With a LP rural exception policy that requires 100% affordable homes to be provided, the mitigation measures will have to be funded out the very limited Arun DC housing capital fund and with competition from other affordable housing schemes in the main parts of Arun district outside the National Park, Findon will not be priority to bring forward. An allocation in the UNP offers the best chance to deliver more than LP policy compliant affordable home numbers on site HD12.

p65 HD13_The current use is an Med Care vehicle repair and maintenance facility, under a five year lease. Double stacked metal shipping containers are stored in the rear parking parking and workers and delivery vehicles are parked indiscriminately at the front and sometimes on street. This is a very significant intensification of use of the former fire station site and is not a long term use that is appropriate in an entirely residential area, all be it close to the A24.

The NPPF and Government Neighbourhood Plan Guidance highlight that in rural villages, smaller sites are more likely to come forward as housing sites and should be included as housing allocation sites in Neighbourhood Plans. It is not relevant that

the SDNPA SHLAA only considers sites with a capacity for more than five houses, that is a SHLAA filter, not a housing site allocation constraint.

The Working Group's architectural consultant is of the opinion that up to 5 small dwelling units can be sensitively arranged on this site after demolition of the former fire station building. Smaller dwelling units are a priority for the UNP and the LP.

p68 HD14_It follows that if the UNP allocated sites remain in the Reg 16 Submission version, they meet the LP housing requirement for Findon, in full, with a buffer, and the extension to the settlement boundary in the UNP will only include the three UNP allocation sites outside the current boundary and not the LP allocation sites.

p69, p72, p77, p85, p87, p91, pgs 90, 92,93,94_Accepted

10.4 SDNPA Legal Opinion

The Working Group commends the SDNPA for seeking a legal opinion on potential risks that may arise in the circumstances that the LP is adopted with two housing site allocations for Findon and the UNP becomes 'made' with different (replacement) housing site allocations.

The 'nuances' about whether the allocation policies in the two Plans would be considered to be in 'conflict' are noted, although the UNP will clearly state that the UNP policies are not additional allocations, but are different or replacement housing allocations.

Until the UNP has been to Examination and subject to any recommendations on allocations by the Examiner, the decision about how to best proceed after that, can be taken then. The local community will at least feel they have had an opportunity to have a proper say on where new housing should be located in Findon and will have the benefit of having the recommendations of an Independent Examiner, at that point.

If the risk of developers' seeking to bring forward housing on both UNP allocation sites and LP allocation sites is still considered likely, post Examination and

Referendum but prior to 'making' the UNP, the SDNPA and the Working Group can discuss the range of available options at that time, which would include the UNP deciding not to request that the UNP is 'made' by the SDNPA Planning Committee, or the SDNPA Planning Committee deciding to remove the LP allocations from the LP, as a minor edit, or the SDNPA deciding not to accept the Examiners recommendations and await the outcome of an appeal by the Working Group.

David Hutchison B Arch PG Dip TP

Acting Lead UNPWG

6 Feb 2019