

Ref	Respondant	Site (s)	Summary of comment	Summary of Working Group response
1	Gerry Plummer	Atalanta/Mayland	Would development be approved as windfall	
2	Linda Martin	HD11	Detailed objection to proposed allocation	
3	Linda Pelling	HD12 and HD13	Objection to allocations, existing parking shortfalls	
4	Ann Martin	Paddocks at Elm Rise	Supports omission	
5	Peter Leach (site owner)	Land east of Pony Farm	Objection to omission as proposed allocation	
6	South Downs Society		No SDS planning consultant currently available to comment	
7	Natural England	general	Liaise with SDNPA on proposed allocations	
8	Environment Agency	general	No comments to make on proposed allocation sites	
9	Arun DC (housing authority)	HD12	Support and hope for allocation. Would prefer proposed policy text to be a bit less prescriptive on off site parking and noise reduction strategies in house design	
10	SDNPA	HD10, HD11, HD12, HD13	Detailed comments, majority on parts of 'made' NP, objection to all proposed allocations, concern over risk of over provision, would like to meet with FPC and WG to 'explain' SDNPA view	
11	Charlie Costello (LGS land owner)	Paddock Way Local Green Space	Detailed objection to designation as LGS	
12	Anna Gillings (Gillings Planning, consultant to Hobden Asset Management, owners of Soldiers Field House)	Soldiers Field House	Detailed objection to omission as proposed allocation	
13	Robin Reay (Luken Beck, planning consultant to Seeward Properties with options to purchase Elm Rise and Beech Road paddocks)	Paddocks at Elm Rise and behind Beech Road	Detailed objection to omission as proposed allocations	
14	Chris Locke (Henry Adams, planning consultant to HD10 and HD11 site owners)	HD10, HD11	Support proposed allocations	
15	Chris Locke (Henry Adams, planning consultant Soldiers Field Stables site owners)	Paddock north of Soldiers Field Stables	Objection to omission as proposed allocation	
16	Historic England	HD10, HD11, HD12, HD13	Local archaeological history, if any should be referred to, design codes for houses should be considered.	
17	Highways England	HD10, HD11, HD12, HD13	No A27 network issues	
18	WSCC Highways		Request for extended deadline to 24 August, agreed	
19	Nicla Snowden	HD 10, HD11	Objection to HD11 if no access via Lister land Wyevale to A24	
20	Sally Ottery (WSCC Estates)	School and playing fields	Objection to designation as Local Green Space and Asset of Community Value (in made NP)	
21	Caroline West WSCC Highways	HD10, HD11, HD12, HD13	No significant highways issues, supportive of enhanced connectivity, guidance on flood maps	

From: Gerry Plummer [redacted]
Subject: RE: Updated Findon Neighbourhood Development Plan_Reg 14 Pre Submission Consultation
Date: 3 July 2018 at 12:44
To: David Hutchison unpwg.findonparishcouncil@gmail.com



Good afternoon.

Thank you for this information. Yes I am the current owner of Mayland.

Reading and trying to understand the current situation, would I be right to conclude that if a developer / builder were to be found, the current proposal of 4 flats and 3 houses would initially be approved subject to all necessary criteria.

I would be most appreciative of your response.

Regards

Gerry Plummer

From: David Hutchison [<mailto:unpwg.findonparishcouncil@gmail.com>]
Sent: Tuesday, June 26, 2018 12:04 AM
To: Gerry Plummer [redacted]
Subject: Updated Findon Neighbourhood Development Plan_Reg 14 Pre Submission Consultation

Hi Gerry,

Not sure if you're still at Maryland but here is a copy of the Regulation 14 Pre Submission Plan for you, together with an introduction which gives details of the consultation period and where to send your observations and comments.

I have also attached key parts of the Evidence Base which informed the housing site allocations, further parts can be found on the Parish Council and Findon Village from early next week, in particular the series of local Findon Viewpoint photographs which illustrate the sites in the local landscape context.

The map showing all the sites will follow, by separate email (file size).

All edge of settlement landowners are being separately emailed with their own copy of the Reg 14 UNP and are being invited to send in comments, out of courtesy.

The Updated Findon Neighbourhood Development Plan Working Group look forward to receiving your comments by 10th August 2018.

All the best.

David

David Hutchison B Arch PG Dip TP

Acting Lead UNPWG on behalf of Findon Parish Council

[REDACTED]
The Quadrangle

15th April 2018

To
The Planning Officer/Secretary/Chief Executive,
Findon Parish Council; South Downs National Park; WSCC; and Arun District Council,

Dear Sirs,

Development of allotment site to the north of The Quadrangle and land lying to the south of Wyevale Garden Centre, Findon, Worthing, West Sussex. Updated Neighbourhood Plan

I have received the latest updated Neighbourhood Plan and as I live next to both the proposed developments I want to make my position clear as set out below and where applicable, I would request a formal response.

1. The second survey showed over 200 responses and it is of no surprise that the majority of the village ranked the development outside the village as their first preference. As I have mentioned before the survey is not a true reflection as the residents in Findon village who are unsurprisingly bound to want the development anywhere but next to their houses. There are about 50 residents in the Quadrangle as opposed to over 1000 in Findon village.
2. Does the neighbourhood plan actually conform with the strategic policies in the Local Plan prepared by the local authority. What is being done about the strategic gap between Findon village and Worthing?
3. Does the neighbourhood plan actually confirm to the strategic policies prepared by SDNP in their management plan? As I understand the plan, any development must not alter the landscape, view or character and the proposed development of both sites would clearly alter this.
4. As I understand it, the Allotment Act provides for the sale of allotment land to be sanctioned by ministerial permission (now devolved to the Secretary of State). Has any approach been made and has this been sanctioned?
5. Local authorities, and parish councils, have a statutory duty to provide allotments which presumably is also the same duty applicable to SDNP. Are both authorities aware of these requirements? Ironically, Findon Parish Council on their website state they are aware of the duty to find land for allotments and are continuously looking for suitable land. Well the answer is already there on their own doorstep with land with a permitted use for allotments, ie, land to the north of The Quadrangle.
6. The development of both plots will have an adverse effect on the residents in The Quadrangle by virtue of disturbance, overlooking and loss of privacy and will have a detrimental effect in the character of this neighbourhood. I would invite you to come and see for yourself the beauty that would be completely destroyed and lost.
7. The Council for the Protection of Rural England have long documented that the proposed changes to any local plan is well known as a loophole being used by developers to secure building plots.
8. The proposed developments are out of scale, overbearing and out of character in the appearance and are far too close to the existing properties in The Quadrangle which includes my property which is the last property and adjoins the allotments and overlooks the land to the south of the garden centre.
9. The loss of existing views from the properties in The Quadrangle will adversely affect the residential amenities in this area. The enjoyment of the views was an important part in my decision to live in The Quadrangle which is the same for my neighbours.
10. There is historic evidence that the land lying to the south of Wyevale has suffered flooding in the past and continues to do so and this must surely be a consideration for the planner. Are

the planners aware of the flooding and what is intended to be done about the water which is near to the A.24 and next to the garden centre?

11. The SDNP state that their brief is to review local housing need and availability of sites within the built up area boundary to determine if future housing can be allocated without a review and extension of the current built up area boundary. Do the proposed developments satisfy this criteria? I would also refer you to the requirement so far as environment and social status are concerned.
12. The SDNP also has an obligation and purpose to give residents a voice in shaping the community which does not mean ignoring the objections and genuine concerns of the residents who are likely to be affected. To simply take the residents of the village itself is simply not good enough.
13. It is well documented that an obligation is placed on local council and SDNP to ensure that there is provision for allotments. When we attended the meeting at the Parish Council, no one really took us seriously. The land to the north of The Quadrangle has a designated planning use as allotments. It is not for the residents to query why the owner allowed the field to go to fallow or why he was able to purchase the land knowing that there was a designated planning use. Presumably the authorities are aware that there are badger setts in the field and as they are protected , what is proposed to deal with this? Why can't the land continue as allotments once the owner has taken steps to clear the land and revert back to its permitted use.
14. The road itself is narrow and this will raise further issues regarding parking . The Quadrangle should remain a cul de sac and it is unfair that building and construction lorries will be using this road which will cause considerable inconvenience and damage. It is bad enough trying to exit onto the A.24 where accidents have already occurred due mainly to the speed limit being 50 mph. The speed limit has been queried but we have been told the limit is fine. Not sure on what basis this statement has been made or is it deemed too costly to ensure safety measures are put in place by reducing the speed limit.
15. Presumably with the intention of having low cost housing on both sites, then what infrastructure plans have been put forward. How do you expect residents with children to cross the busy A.24?

I reserve the right to raise such further points as may be necessary when I hear back from you with your responses .

Yours faithfully

Mrs Linda Martin



From: Linda Pelling [REDACTED]
Subject: Updated neighbour plans
Date: 23 July 2018 at 10:44
To: unpwg.findonparishcouncil@gmail.com



Dear Sirs,

We wish to make known our fears regarding the proposed HD12 & HD13.

We live in the Old Cottages and although the HD12 houses will not affect us directly, the impact to traffic and parking to what is already an over busy area, will mostly definatly effect us. The HD13 will directly affect us.

The access road , turning up by the firestaion site and then into nightingales road is already very busy and narrow with cars parked all over the place where they can. There are frequent accidents on that sharp corner by the old fire station.

We can see on the proposed plans that provisions will be made to address all these issues, but I cannot stress enough how important it will be to get these problems addressed properly ,prior to any new developments going ahead.

Nightingales, which was essentially a retirement complex, has now turned into social housing, with it bringing many more car owners. Old cottages, 6 of us have no parking atall.

Chopping up the Oval is not a nice option, and we would fight against this.

Please think very carefully about all of this before condeming all of us residents to a potential nightmare.

Yours sincerley

The Pelling Family [REDACTED]

From: David Hutchison unpwg.findonparishcouncil@gmail.com
Subject: Re: Neighbourhoodp plan
Date: 13 August 2018 at 13:52
To: Paul Martin [REDACTED]



Ann,

Thank you taking the time to submit comments.

The updated neighbourhood plan working group will review all submissions over the next two months before finalising the Reg 15 Submission.

Best wishes.

David

David Hutchison
Acting Lead Updated Findon Neighbourhood Plan Working Group.

On 31 Jul 2018, at 09:49, [REDACTED]:

Dear parish council

As regards to the updated plan, I have been in Findon for over 50 years, I know we have to go with progress and yes the village has no doubt changed but the site at Elm Rise is clearly the ruination of Findon for all, this site needs to be stopped and other sites thought carefully about before it's too late we should never be in this situation now had this whole process been dealt with properly in the first place I hope as our parish council you now support the village don't destroy it Yours sincerely Ann Martin

2018 Updated Neighbourhood Plan

Comments

Thank you for sending across the Updated Findon Neighbourhood Plan (“UFNP”) and site allocations document. I have now had a chance to review the content and consulted with my planning advisor.

Land at Pony Farm

As you will be aware the Land East of Pony Farm, which is in my ownership has not been allocated under the revised plan. As a result, I would like to formally register my objection to this and respectfully ask that the UNP Working Group (“UNPWG”) respond to my queries to ensure a sound and thorough process has been followed in its preparation.

Having reviewed the UFNP and the published evidence base on the Findon Parish Council (“FPC”) website I can only find a single table summarising past and current landscape assessments. As a result, it appears that there is a very limited evidence base that has been used to assess each individual site. If I am incorrect on this point, then please provide me with the documentation and make it available on the FPC website.

The evidence base that I have reviewed (Table 1) assesses the Land at Pony Farm as “medium high” for sensitivity. I disagree with this conclusion.

The Viewshed prepared by UNPWG, which provides a range of immediate and distant photographs of Findon Village does not demonstrate that the Land at Pony Farm is visible. In fact, viewpoint 20(a) demonstrates that the parcel of land is in fact not visible from the wider area. Yet it has been classed as Medium High in your evidence base. On what basis have you reached this conclusion?

The SDNP most recent SHLAA (2016) did in fact review and allocate potential sites for development. Pony Farm was included in that analysis under reference AR013. The reason given for it being rejected was stated as “there is no evidence of availability”. The summary concluded that “There is no reason to indicate why development on the site is not achievable”. If the UNPWG disagrees with their independent findings I would like to understand the basis on which this conclusion has been reached?

This view is also shared by the independent report that has been carried out by PND in 2017 in which it concludes that the site, if developed would have a limited impact on both immediate and distant viewpoints. I have included a copy of this independent report for your reference and provided a summary of the findings below.

“Overall it is concluded that no landscape or visual receptor will sustain in excess of a minor/moderate change of effect with the overwhelming majority of the selected viewpoints experience either very slight or no visual change. The appraisal of seasonal change concludes that during the months of reduced or no leaf cover the change in view will only affect a small number of receptors, principally those within immediate proximity to the site. It is concluded that the local landscape and visual receptors within the study area possess the necessary capacity to accept the presence of the proposed development without the local landscape character and existing views being undermined. Therefore, to conclude, although there are landscape and visual receptors which will sustain a change, the introduction of the proposed development within this landscape is considered to be of insignificant/minor significance.”

I would also refer you to the David Hare Landscape Character and Sensitivity Assessment of Findon West Sussex Part One Landscape Character Assessment May 2014 [LCA] and Part Two Landscape Sensitivity and Capacity Assessment August 2014 [LSCA] and its supporting

comments from the NP Housing Topic Group October 2014. These landscape studies form part of the Findon Neighbourhood Plan. The Land East of Pony Farm to which the UFNP relates is highlighted within this landscape study as a site suitable for possible development. Initially raised in the 2009 Baker Associates SHLAA study for Arun DC [site F3] yet dismissed due to policy, the David Hare Assessment 2014 proposes the sites reconsideration as suitable for development. This landscape study takes into consideration the adjoining approved application at Soldiers Field and states;

“Given that the adjoining site is to be redeveloped this site could come forward without major adverse effects if carefully designed and built”.

This statement is further reinforced by the NP Housing and Design Topic Group’s comments and the Topic Group paper. This paper proposes that the Land East of Pony farm should be its own Parcel 5C and is described as ‘overgrown Land East of Pony Farm’. Additionally, this paper states that;

“Parcel 5c should be ‘slight’ on sensitivity as, secluded, well screened by trees and hedges and not visible from the open down land gallops to the east or from Nephote Green resulting in a capacity of ‘medium/high’ and a comment ‘visually contained’.”

And the paper states that;

“The site is assessed as having ‘slight’ harm to the landscape from distant viewpoints with ‘possible’ achievable physical constraints.”

Considering the description above and the LSCA where [Pg 9] it states, “if change can be accommodated within a strong edge this is likely to be less apparent within the wider landscape than in situations where the edge is weak.” Development at Land east of Pony Farm provides the opportunity to strengthen and reinforce the settlement boundary alongside the development at Soldiers Fields. The applications position in the Village Fringe Character as shown in the Findon Parish Neighbourhood Plan Draft Landscape Character Areas [Fig 11. Pg 21. LCA] is a character area highlighted as less sensitive to change with the ability to absorb development in the least damaging way.

The UNPWG has also assessed Pony Farm as having “no satisfactory access proposed”. This is something that I find difficult to understand and accept. The UNPWG will be aware that the site itself has recently (October 2017) been subject to consultation with the Highways department who have assessed the road and access as being acceptable to accommodate residential development. I have attached a copy of their recent correspondence and title map in relation to this matter. Therefore, can the UNPWG please explain why the site has been assessed contrary to this advice and what analysis has been carried out to reach this outcome? What methodology has been applied to reach this conclusion and what professional expertise has been utilised to assist this process?

As the UNPWG will be aware a planning application for the Land at Pony Farm has recently been submitted under reference SDNP/17/05058/FUL, which is now the subject of an appeal hearing. This detailed application addresses concerns that have been identified by independent professionals and I would ask why that evidence base has not been utilised to assist in assessing the site for a single dwelling and not the 4 as proposed by the UNPWG. The suggestion of delivering 4 homes on the site is something that the UNPWG have put forward without any consultation with the land owner and then dismissed the site in its entirety.

In summary I believe that the evidence base and methodology that has been used by the UNPWG to assess the Land at Pony Farm is not thorough, flawed and has not followed the process that you would expect of a statutory planning body i.e. SDNPA.

Updated Findon Neighbourhood Plan 2018

One of the key drivers for submitting the UFNP is to allocate housing sites as the current plan does not contain any. This is at a time when a key narrative within the NPPF 2018 is to boost significantly the supply of houses.

However, I do not believe that sufficient evidence has been collected or robust and **compelling** analysis carried out to allow the FPC to allocate sites in the UFNP and exclude those they deem unacceptable. The SDNPA are the planning body that will decide, which, if any of the sites are suitable for development. There can be no certainty that the allocated sites in the UFNP can and will be developed. By way of example Page 51 Section 5.0 Neighbourhood Plan policies HD9.4 states that the “family’s aspiration” is to replace the existing garden centre, which will in turn support development of the site. However, the lease does not expire until 2025 by which time “aspirations” and circumstances could change. There has also been no **compelling** evidence provided to demonstrate the allocated sites in the UFNP are deliverable and can be accommodated i.e. Highways, Flood risk assessments, Contamination, Habitant surveys and Financial viability assessments. So, for the FPC to allocate a site(s) of this nature and exclude others that they believe to be more suitable than the SDNP seems flawed and contrary to good planning practice. The UFNP appears to be a reaction to the SDNP allocating sites on its behalf, which has meant they have not had sufficient time to fully and thoroughly explore alternative sites to those identified by the SDNP.

The UFNP should allocate as many sites as possible and not limit it to a few, which will provide a **buffer** should circumstances change or a site is found to be undeliverable for whatever reason. The SDNP will then assess each potential site on its own merits at the time a planning application is made and by using sound and well-established planning practices.

I also believe the UFNP in its current form is not consistent with the 2018 NPPF, which seeks to promote and significantly boost housing. In particular paragraphs **59,60,61,64,67,68,69,72,73,74 and 77.**

Your sincerely

Peter Leach

Land Owner at Pony Farm

From: SDS Enquiries enquiries@southdownssociety.org.uk
Subject: Re: Reg 14 Pre Submission_Findon Updated Neighbourhood Plan
Date: 6 August 2018 at 09:58
To: David Hutchison unpwg.findonparishcouncil@gmail.com



Dear David

Thank you for your email.

We are in a tricky position to provide meaningful comment at the moment as our planning and policy officer has had to retire on the grounds of ill health.

I have however passed your comments onto our trustees to see if I can gain comments. We are actively seeking a new planning and policy officer.

Kind regards

Alison

On 2 August 2018 at 08:26, David Hutchison <unpwg.findonparishcouncil@gmail.com> wrote:

Good morning,

Towards the end of June we emailed you a copy of the Reg 14 Pre Submission Findon Updated Neighbourhood Development Plan and invited you to comment on the Plan, in particular the proposed housing allocation sites.

The earlier and current 'made' Findon Neighbourhood Plan (2016) did not include any housing site allocations and subsequently the National Park Authority allocated two housing sites on the outside edge of the settlement boundary.

The community in Findon and the neighbourhood plan qualifying body, Findon Parish Council, felt strongly however that there were alternative, less landscape sensitive and available sites and therefore have prepared an Updated Neighbourhood Plan with these alternative housing site allocations.

The closing date for the Reg 14 Pre Submission Consultation is 10 August and we just wondered if the South Downs Society were going to take the opportunity to comment as we would appreciate your views on the proposed housing site locations.

Thank you.

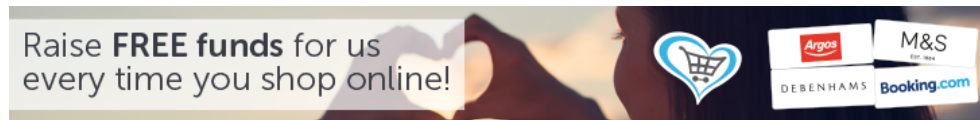
Best wishes.

David Hutchison B Arch PG Dip TP
Acting Lead
Findon Updated neighbourhood Plan Working Group

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Twitter: [@southdownssoc](https://twitter.com/southdownssoc)
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From: Plan Cons Area Team (Sussex and Kent) (NE) PlanConsAreaTeamSussexandKent@defra.gsi.gov.uk
Subject: FAO: David Hutchison (NE ref - 250426) - Updated Findon Neighbourhood Development Plan (with housing site allocations) - Regulation 14 consultation.
Date: 7 August 2018 at 17:08
To: unpwg.findonparishcouncil@gmail.com



unpwg.findonparishcouncil@gmail.com

250426 - Updated Findon Neighbourhood Development (with housing site allocations) - Regulation 14 Pre-submission version consultation.

Dear David Hutchison,

Thank you for consulting Natural England on your updated Neighbourhood Development Plan (NDP).

I note that the NDP now allocates housing sites, with the stated intention to accommodate 33 to 38 houses. However, it is also noted that the parish lies within a protected landscape (the South Downs National Park) and that the submitted 'South Downs Local Plan Submission (Regulation 22) - Schedule of changes to the Pre-submission Local Plan' document indicates a target of 28 (reduced from the 30 stated in the main Pre-submission LP document). The local planning authority may consider that such provision conflicts with the requirement in section 172 of the NPPF that 'the scale and extent of development within... (*the National Park*) ...should be limited'. They might also consider that it constitutes major development, as defined under note 55 of the NPPF (for which planning permission should be refused, other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest).

We advise, therefore, that you liaise with the local planning authority with regard to the proposed additional provision.

I hope you find these comments helpful, however, if there are issues I have not covered, please let me know and I will respond as quickly as possible.

Yours sincerely,

**Rebecca Bishop MRTPI
Adviser
Sustainable Development
Sussex & Kent Team**

**Natural England
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County Hall,
Spetchley Road,
Worcester
WR5 2NP**

**02080 266009
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We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

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From: unpwg findonparishcouncil [<mailto:unpwg.findonparishcouncil@gmail.com>]

Sent: 21 June 2018 23:15

To: lucy.seymourbowdery@westsussex.gov.uk; communities@westsussex.gov.uk; donna.moles@arun.gov.uk; mark.coates@arun.gov.uk; Enquiries (NE) <enquiries@naturalengland.org.uk>; planningSSD@environment-agency.gov.uk; southeast@historicengland.org.uk; elizabeth.cleaver@highways.gsi.gov.uk; contacts.coastal@nhs.net; customerservice@southern-electric.co.uk; customerservice@britishgas.co.uk; planning_policy@southernwater.co.uk; contactcentre@sussex.pnn.police.uk; info@cpre.org.uk; enquires@southdownssoceity.org.uk; claphamclerk@gmail.com; patchingpc@gmail.com; admin@angmering-pc.gov.uk; planning_policy@adur-worthing.gov.uk; findonhallbooking@gmail.com; findonparishcouncil@gmail.com

Subject: Updated Findon Neighbourhood Development(with housing site allocations)_Reg 14 Version

Dear Consultees,

Please find attached the Reg 14 Pre Submission version of the Updated Findon Neighbourhood Development Plan (2018-2035) and an accompanying statement (Flyer_Intro) which gives details of the consultation period and how to submit your comments by 10 August 2018.

The Updated Neighbourhood Development Plan has been prepared to include housing site allocations to meet the housing requirement for Findon which is included in the new SDNPA Local Plan, currently being reviewed by the Planning Inspectorate.

We look forward to receiving comments from you which will inform the Reg 16 version of the Updated NP to be submitted to the SDNPA and an Independent Examiner later this year.

The Reg 14 Updated NP and accompanying statement have also been sent to the SDNPA and local landowners and their agents and is available to view on the Parish Council and Findon Village websites.

Thank you for taking the time to look at our proposals and make your observations.

Best wishes.

David Hutchison B Arch PG Dip TP

Acting Lead, Updated Findon Neighbourhood Development Plan Working Group

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From: Greenwood, Suz K Suz.Greenwood@environment-agency.gov.uk 
Subject: Environment Agency Response Reg 14 Findon NP
Date: 8 August 2018 at 09:37
To: unpwg.findonparishcouncil@gmail.com



Dear Sir/Madam,

Thank you for consulting the Environment Agency on your Reg 14 Findon updated Neighbourhood Plan. We are a statutory consultee in the planning process providing advice to Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf

We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are high. Based on the environmental constraints within the area, we therefore have no detailed comments to make in relation to your Plan at this stage. However please find attached a copy of our advice.

Kind Regards

Sustainable Places
Solent & South Downs

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Neighbourhood
Plan C...run.pdf

From: Nat King-Smith (MHA) nks@mharchitects.co.uk
Subject: RE: Reg 14 Pre Submission Consultation_Findon Updated Neighbourhood Plan
Date: 8 August 2018 at 12:59
To: Mark Coates Mark.Coates@arun.gov.uk, David Hutchison unpwg.findonparishcouncil@gmail.com



Hi David,

I concur with Mark's comments. I would like to add the following;

- b) could you not say that an acoustic consultant needs to carry out sound testing and then propose suitable robust techniques for achieving the WHO standard?
- c & d) as Mark mentions we have carried out a parking survey and would be happy to discuss the results of this further but would prefer to avoid specific numbers in the plan at the moment.
- 2a) happy to provide equivalent species but we wouldn't be able to provide them at the same maturity, this could be misread. We are planning on enhancing the boundaries significantly.

Kind regards

Nathanael King-Smith BA(Hons) Arch, Dip Arch, ARB
Director
m. 07773 384917 | e. nks@mharchitects.co.uk Click to Visit, Like and Follow MHA at

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-----Original Message-----

From: Mark Coates <Mark.Coates@arun.gov.uk>
Sent: 02 August 2018 15:23
To: 'David Hutchison' <unpwg.findonparishcouncil@gmail.com>
Cc: Nat King-Smith (MHA) <nks@mharchitects.co.uk>
Subject: RE: Reg 14 Pre Submission Consultation_Findon Updated Neighbourhood Plan

Hi David

Im fine thanks and I hope you are too .

Generally the District Council supports the inclusion of the land north of Nightingales in the updated plan and we hope it will get an allocation.

I have arranged to meet the PC Chair , Sean Smith and some other Cllrs on his return from holiday to discuss our proposals for the site as we are not sure whether it is best to submit it now as a rural exception site or wait until the neighbourhood plan gets adopted to give it more 'weight' and flexibility on the tenure and if that is done what the timing delay will be . Your views on this would be appreciated.

With respect to the specific conditions attached to the site HD 12 from page 61 onwards I would comment as follows:

B - acoustic attenuation of road noise to WHO levels is required and accepted but do we need to prohibit opening windows? These may be required for emergency egress as well as ventilation - there appears to be too much prescription on how the attenuation is met.

C- a parking survey has already been commissioned and does not support the perceived need for additional parking although the Council will discuss this with the Parish and may be able to reach an agreement I don't think this should be a planning condition F - this mix is OK but we don't have a great deal of info on the likely demand for affordable housing as this often does not materialise until there is an actual project that people can express an interest in so it may be better to be a bit more flexible here as the Council may wish to increase the number of affordable units slightly to meet higher needs ?

G- Not sure what is required to demonstrate this ?

2 a + b The increase in biodiversity is accepted as an outcome but it would be useful to know what the particular species are that would thrive in on the site so that we can specify them .

Hope this is useful

I have forwarded the document to Nat our Architect at MH Architects in Chichester and he may have further comments .

Kind regards,

Mark Coates

MarkCoates,
Affordable Housing Consultant working on behalf of Arun District Council

Arun District Council | Location: First Floor. Arun Civic Centre. Maltravers Road. Littlehampton. BN17 5LF

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-----Original Message-----

From: David Hutchison [<mailto:unpwg.findonparishcouncil@gmail.com>]
Sent: 02 August 2018 08:41
To: Mark Coates
Subject: Reg 14 Pre Submission Consultation_Findon Updated Neighbourhood Plan

Good morning Mark,

Trust you are well.

Just wondered if Arun DC were going to comment on the Reg 14 Pre Submission FUNP, particularly the proposed housing allocation on the field adjoining Nightingales.

The closing date is 10 August.

Thank you.

All the best.

David

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DX 57406 Littlehampton

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Report to	Planning Committee
Date	9 August 2018
By	Director of Planning
Title of Report	The South Downs National Park Authority's response to the Pre-Submission (Regulation 14) Consultation on the updated Findon Neighbourhood Development Plan
Purpose of Report	To agree the content of the South Downs National Park Authority's (SDNPA) response to the pre-submission consultation on the updated Findon Neighbourhood Development Plan

Recommendation: The Committee is recommended to agree the Table of Comments as set out in Appendix 3 of the report which will form the SDNPA representation to the updated Findon Neighbourhood Development (FNDP) Plan pre-submission consultation.

I. Introduction and Summary

- I.1 The South Downs National Park Authority (SDNPA) actively promotes and supports community led plans, particularly Neighbourhood Development Plans (NDPs) where growth needs to be accommodated and planning issues exist. On adoption, NDPs form part of the Development Plan for the neighbourhood area, alongside strategic planning policies which are prepared by the Local Planning Authority.
- I.2 The following report and appendices set out the SDNPA response to the Pre-Submission version of the updated Findon Neighbourhood Development Plan (FNDP). The SDNPA comments relate to the potential risk of progressing the FNDP proposed housing allocations alongside allocations in the South Downs Local Plan (SDLP). The majority of the FNDP is unchanged from the previous 'made' version; modifications are clearly marked with underlining or strikethrough of the text.
- I.3 Findon Parish Council is the first Qualifying Body in the National Park to prepare an update to a 'made' Neighbourhood Plan. The original FNDP chose not to allocate sites to meet the housing provision figure set by the SDNPA. This was against the advice given by both officers and Members. At examination, the examiner only let the plan proceed to referendum on the understanding that the SDNPA would allocate sites for housing in the Local Plan. The SDNPA proposed housing allocations in the Pre-Submission SDLP. The Qualifying Body did not support the Local Plan allocations and began the process of updating the FNDP with alternative housing allocations.
- I.4 This report highlights the risks associated with progressing the updated FNDP. It also sets out the concerns of the Authority in regard to the proposed allocations. Following the Pre Submission consultation the Parish Council will need to consider how they progress their updated FNDP in light of the possible risks set out in this report.

- 1.5 The FNDP is being considered by Planning Committee at pre-submission stage as it is the first NDP to be significantly modified. It allocates land for housing, and there are some conflicts with the Pre-Submission South Downs Local Plan.
- 1.6 The designated Neighbourhood Area forms **Appendix 1** of this report. The updated Pre-Submission FNDP can be found at **Appendix 2** and the SDNPA response to this consultation at **Appendix 3**. The Authority has sought legal advice on the matter, which is set out in full in **Appendix 4**.

2. Background

- 2.1 Findon Parish Council (FPC) is the 'qualifying body' with responsibility for preparing the updated FNDP. The original FNDP was prepared between December 2012 and the final plan was 'made' at Planning Committee in December 2016.
- 2.2 The updated FNDP proposes a number of changes and additions to the original FNDP, these include the allocation of four housing sites to deliver around 31 dwellings, modification to the existing Settlement Boundary and a number of minor changes to policy and supporting text.
- 2.3 The 'made' FNDP chose not to allocate land to meet the housing provision figure set in the emerging South Downs Local Plan. In response to the Pre-Submission and Submission consultations on the FNDP, the Authority expressed its concerns that the lack of allocations failed to demonstrate the plan's contribution to the achievement of sustainable development. Following the submission of the original FNDP, the Qualifying Body indicated that they would like to propose housing site allocations at the post-submission stage. The Examiner felt this was inappropriate as it didn't allow the wider community to comment on those proposals. The Examiner explained in his report that the FNDP did not demonstrate conformity with the development plan as it did not allocate sites in line with strategic policies set in the emerging Local Plan. However, the Examiner decided that many of the other policies in the plan warranted progressing past examination. Therefore the Examiner made modifications to the FNDP, removing all policies which related to allocations and settlement boundary, and recommended that the SDNPA should allocate the necessary housing sites in Findon in the Local Plan.
- 2.4 Following this decision the National Park Authority assessed a range of sites in Findon and proposed two housing allocations to meet the housing provision figure of 30 dwellings set by draft Policy SD26: Supply of Homes of the Pre-Submission Local Plan. These housing allocations are:
- SD71 Land at Elm Rise, Findon to deliver 15 – 20 dwellings; and
 - SD72 Soldiers Field, Findon to deliver 10 – 12 dwellings
- 2.5 Findon Parish Council responded to the proposed housing site allocations through the South Downs Local Plan Pre-Submission consultation. At this time Findon Parish Council made it clear that they did not support the proposed Local Plan allocations, and their intention was to prepare an updated FNDP to include housing allocations to meet the housing provision figure set by the SDNPA. The SDNPA made it clear to the Parish Council that the Pre-Submission SDLP would proceed with proposed housing site allocations in Findon. It was also made clear that there were a number of risks associated with the Parish Council progressing an updated FNDP, these risks are set out in **Appendix 3** and summarised in section 4 of this report.
- 2.6 This presents an unusual situation whereby the updated Pre-Submission FNDP and the Submission SDLP are proposing different housing allocations to meet the housing provision figure set in Policy SD26 of the SDLP. The FNDP also proposes an alternative Settlement Policy Boundary to that in the SDLP. The updated FNDP states that the site allocations proposed by the FNDP are not in addition to those proposed by the SDNPA, but are presented as alternative housing allocations. This is a matter that the Local Plan Inspector may choose to raise in his Matters and Issues that are due shortly. It is also likely that it is a matter that will be raised by the FNDP Examiner if the Plan reaches examination. Legal advice has been sought on the matter and is set out in full in **Appendix 4**.

- 2.7 In summary, this legal advice states that, whichever plan is made or adopted last will supersede, where relevant, the other. However, that is only the case if the allocations are viewed to be in conflict and state explicitly the intention to supersede. If all the allocations can be viewed as suitable albeit different then they could all be granted planning permission. The question then is whether the development of all these sites would fail to conserve the landscape, wildlife and cultural heritage of the National Park and applications could then be refused.
- 2.8 It will be for the Local Plan Inspector to determine whether it is appropriate for the Local Plan proposed housing site allocations to be adopted in light of the proposals in the updated FNDP. Furthermore, it will be for the Examiner of the Neighbourhood Development Plan to decide whether the sites should be allocated in the FNDP in light of the Local Plan allocations.
- 2.9 If Findon Parish Council continue to progress the updated FNDP, with alternatives sites and settlement boundary policies, it should be aware that an Examiner may consider the plan not to be in general conformity with the emerging SDLP, and therefore cannot proceed to referendum. At this Pre Submission stage we cannot offer any certainty on how these matters will be resolved and can only highlight the risks. For that reason the SDNPA are recommending that the updated FNDP is not progressed to submission, and that the current FNDP remains the made Neighbourhood Plan for the Parish of Findon.

3. Pre-submission consultation

- 3.1 The Neighbourhood Planning Regulations require all qualifying bodies (Findon Parish Council in this instance) to carry out pre-submission consultation on a draft of the NDP prior to submission to the local planning authority. The consultation must be for a minimum of six weeks and includes consulting statutory bodies. The updated FNDP consultation draft was published on 23 June 2018 and the consultation runs for 6 weeks until 10 August 2018.
- 3.2 The Neighbourhood Planning Regulations state that a NDP must be in general conformity with the strategic policies contained in the Development Plan for the area. Therefore, it is a requirement that the FNDP is in general conformity with the saved policies of the Arun District Council Local Plan (2003) and the policies contained within the Submission SDLP.
- 3.3 While there appear to be no immediate issues relating to general conformity with the saved policies of the Arun District Local Plan 2003, there are issues relating to the FNDP conformity with the Submission SDLP. The updated FNDP proposes a number of alternative housing sites to meet the housing requirement for Findon, these sites are intended to be alternatives to those proposed in the Submission SDLP. However, the SDLP has now been submitted to the planning inspectorate and includes two proposed housing site allocations and modifications to the existing settlement policy boundary. The updated FNDP proposes alternative housing allocations and alternative modifications to the Settlement Policy Boundary. As currently presented the updated FNDP will not be in general conformity with the Submission version of the South Downs Local Plan.
- 3.4 The Submission version of the South Downs Local Plan is now with the planning inspector, who has been sent a copy of this Planning Committee report. At this stage the SDNPA recommend that the updated FNDP does not progress to submission due to the conflicts set out in our response at **Appendix 3**, and the potential risk in proposing alternative sites to those proposed in the Submission version of the South Downs Local Plan.
- 3.5 The updated FNDP has been assessed to determine whether a Strategic Environmental Assessment / Sustainability Appraisal (SEA/SA) is required. It has been determined that an SEA/SA is not required for the updated FNDP. The updated FNDP has also be assessed to determine whether a Habitats Regulation Assessment (HRA) is required, and it has been determined that a HRA is not required for the updated FNDP.

4. Findon Neighbourhood Development Plan – SDNPA response

- 4.1 The SDNPA formal representation to the FNDP pre submission consultation is set out in **Appendix 3**. The following key points and overarching issues are raised in the representation:

- a) There is a significant risk associated with progressing the updated FNDP. The updated FNDP includes four site allocations to meet the housing provision figure set in the SDLP. These are different sites to those allocated in the Submission SDLP. There is a risk that all proposed allocations could be allocated in the respective plans and in turn granted planning permission for development. This could result in twice the number of new homes being allocated in the combined plans. Although this would contribute to meeting housing need in the area, the key question is whether this level of development would fail to conserve the landscape, wildlife and cultural heritage of the National Park.
- b) The SDLP sets out a different Settlement Policy Boundary to that proposed in the FNDP. This presents a number of risks, for example, if the Settlement policy boundary as shown in the SDLP is agreed, this would result in the site allocations proposed in the FNDP falling outside of an established Settlement Policy Boundary. This could be resolved through the FNDP examination allowing further modifications to the boundary, or alternatively, the FNDP failing at Examination. The Authority is of the opinion that the principle of establishing a settlement boundary for the village is a strategic matter dealt with under strategic policy SD25: Development Strategy of the SDLP. The detail of where that boundary should go is a non-strategic matter that can be addressed in either the SDLP or NDP.
- c) During the preparation of the original FNDP, the SDNPA recommended that some policies should be removed from the main Neighbourhood Plan and placed in a supporting document which sets out community aspirations. These recommendations were agreed by the Examiner who removed a number of policies and placed them in a separate document for community aspirations. A number of these policies are now included in the main FNDP. The Authority recommends in line with the Examiner's original findings that that these policies are again removed from the main plan and placed in a separate community aspirations document.
- d) The SDNPA has a major in-principle concern regarding the landscape impact of the scale and location of development envisaged by the masterplan (Policy HD9), particularly in terms of the significant change to settlement form and extension of built form towards Worthing (Findon Valley) along the A24 corridor. The area is also on the opposite side of the A24 and is therefore largely detached from the settlement form, notwithstanding aspirations to mitigate the barrier effect of the A24.
- e) Policy HD10 seeks to allocate land on the Southern part of the Paddocks at the garden centre. However this allocation conflicts with Policy ESI of the updated FNDP, which seeks to protect that parcel of land as part of the gap between Findon, Findon Valley and Worthing. Even if Policy ESI is deleted the SDNPA feel this site is not considered suitable for allocation as it is removed from the existing settlement of Findon, development would not relate well to the existing settlement and development will not fit with the character of the settlement form as currently exists
- f) Policy HD12 indicates that a successful development would rely on undergrounding of overhead power cables, new vehicle access and parking, proposals to mitigate the effects of traffic noise and a very high proportion of affordable housing which represents a potentially significant constraint to delivery. Therefore it is considered that the sites proposed for allocation in the SDLP are more suitable. If the issues highlighted (and potentially others) can be mitigated, it is considered that the site may have scope to come forward as a rural exception site, given it is a greenfield site outside the existing settlement boundary.
- g) Policy HD13, land at the former Fire Station is a site of 0.1 hectares within the settlement boundary, which is currently in use as an ambulance station. It is considered likely to be too small a site to comfortably accommodate 5 or more dwellings, and therefore should not be considered for an allocation site. The site is within the settlement boundary, hence any future residential development on this site would be acceptable in principle and classed as windfall development. Furthermore, there are questions over deliverability as the site is currently in use as an ambulance station.

5. Planning Committee

- 5.1 This is the first occasion that the **updated** FNDP has been presented to Planning Committee. However, the original FNDP was presented to Planning Committee on three occasions; Submission, Decision Statement and Making of the Plan. The updated FNDP is being considered at this stage due to the potential conflict with the submission version of the South Downs Local Plan, the level of development being proposed and the allocation of land.

6. Next steps

- 6.1 If agreed the response will be sent to Findon Parish Council for them to consider alongside the other representations they receive. They will then need to consider how the progress their updated plan, and consider whether it is appropriate to amend the plan and submit it to the SDNPA for examination. An informal meeting with the parish council will also be strongly recommended to talk through the issues arising.

7. Other Implications

Implication	Yes/No
Will further decisions be required by another committee/full authority?	Yes – It is anticipated that Planning Committee will be asked to agree the SDNPA response to the FNDP at all significant stages if the plan progresses. The next occasion will be the SDNPA representation on the submitted plan.
Does the proposal raise any Resource implications?	<p>Yes - The SDNPA has invested staff resources in supporting the development of the current FNDP by regularly attending steering group meetings and providing comprehensive feedback and comments on early drafts of the FNDP. Significant financial resource has been provided through the reallocation of the Governments New Burdens funding and the allocation of SDNPA funding amounting to £35,518.40. The SDNPA have claimed a total of £50,000 in New Burdens Funding and Front Runner Grant to support the cost of preparing the original FNDP.</p> <p>The SDNPA will receive additional funding to support the costs of supporting the preparation of the updated FNDP, as the update proposes significant modifications. Therefore the SDNPA will receive £20,000 following a successful referendum.</p> <p>However, it should be made clear that there is a risk associated with the progression of the updated FNDP, if the updated FNDP does not pass examination, the SDNPA will have to cover the cost of examination without the receipt of New Burdens funding which would be available following a successful referendum.</p>
Has due regard been taken of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	Due regard will be taken of the South Downs National Park Authority's equality duty as contained within the Equalities Act 2010. Findon Parish Council, who have the responsibility for preparing the neighbourhood plan, will be required to prepare a Consultation Statement to support the submission version of the updated FNDP setting out how all sections of the local community (people who live, work or carry out business in the neighbourhood area) including hard to reach groups, have been engaged in the plan's production.

Implication	Yes/No
Are there any Human Rights implications arising from the proposal?	None
Are there any Crime & Disorder implications arising from the proposal?	None
Are there any Health & Safety implications arising from the proposal?	None
<p>Are there any Sustainability implications based on the 5 principles set out in the SDNPA Sustainability Strategy:</p> <ol style="list-style-type: none"> 1. Living within environmental limits 2. Ensuring a strong healthy and just society 3. Achieving a sustainable economy 4. Promoting good governance 5. Using sound science responsibly 	<p>The qualifying body with responsibility for preparing the neighbourhood plan must demonstrate how its plan will contribute to the achievement of sustainable development. Please note that the sustainability objectives used by qualifying bodies may not be the same as used by the SDNPA, but they will follow similar themes.</p> <p>Strategic Environmental Assessment</p> <p>It was concluded that an environmental assessment of the updated Findon Neighbourhood Plan will not be required therefore Findon Parish Council will be required to prepare a statement in support of the Submission version of the updated FNDP to set out how their plan contributes to the achievement of Sustainable Development.</p>

8. Risks Associated with the Proposed Decision

Risk	Likelihood	Impact	Mitigation
Findon Parish Council do not take account of the significant concerns raised by the SDNPA in relation to the progression of an updated FNDP. This could result in an updated FNDP progressing to Submission and Examination where there is a risk that the updated FNDP will fail examination as it is not in general conformity with the policies contained in the Submission version of the SDLP.	Medium	High	This report sets out clearly the risks associated with progressing the FNDP, and the Qualifying Body have been informed of the SDNPA concerns prior to this report. This report and the concerns raised will also form part of the Examination of the FNDP (should it proceed to submission) therefore the Examiner will also be in a position to consider this matter further.
The updated FNDP includes four site allocations to meet the housing provision figure set in the SDLP. These are different sites to those allocated in the Submission SDLP. There is a risk that all proposed allocations could be allocated in the respective plans and in turn granted planning permission for	Medium	High	The SDNPA highlight this concern to Findon Parish Council, to ensure they are able to take an informed decision as the progress to submission. The matter will also be highlighted to the Local Plan Inspector, the Inspector may choose to raise this in his Matters and Issues that are due shortly. The matter will also be made to the FNDP Examiner if the Plan

development. This would result in a much higher level of development for the settlement of Findon than that proposed as appropriate in the SDLP.			reaches examination. The SDNPA have sought legal advice to determine how this matter may progress through the local plan and FNDP examinations.
There is a reputational risk for the SDNPA associated with raising areas of concern about the FNDP. Communities are sometimes frustrated by the perception that their hard work and effort in producing such plans is not fully appreciated and taken into account. However, to not highlight the possible concerns of the Authority at this stage in the plan preparation would be failing in our duty to support such groups and potentially result in a plan that does not deliver outcomes that meet the needs of both the community and the SDNPA.	Medium	Low	SDNPA officers will work closely with the FNDP group and the Parish Council to ensure the wider community understand why the SDNPA are making these recommendations

TIM SLANEY

Director of Planning

South Downs National Park Authority

Contact officer: Chris Paterson (Communities Lead)

Tel: 01730 819 286

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Appendices

1. Findon Designated Neighbourhood Area Map
2. Updated Findon Pre-submission Neighbourhood Plan 2018-2035 – STAND ALONE DOCUMENT
3. SDNPA Response to the Pre-submission Draft updated Findon Neighbourhood Plan
4. Legal Advice on Findon NDP

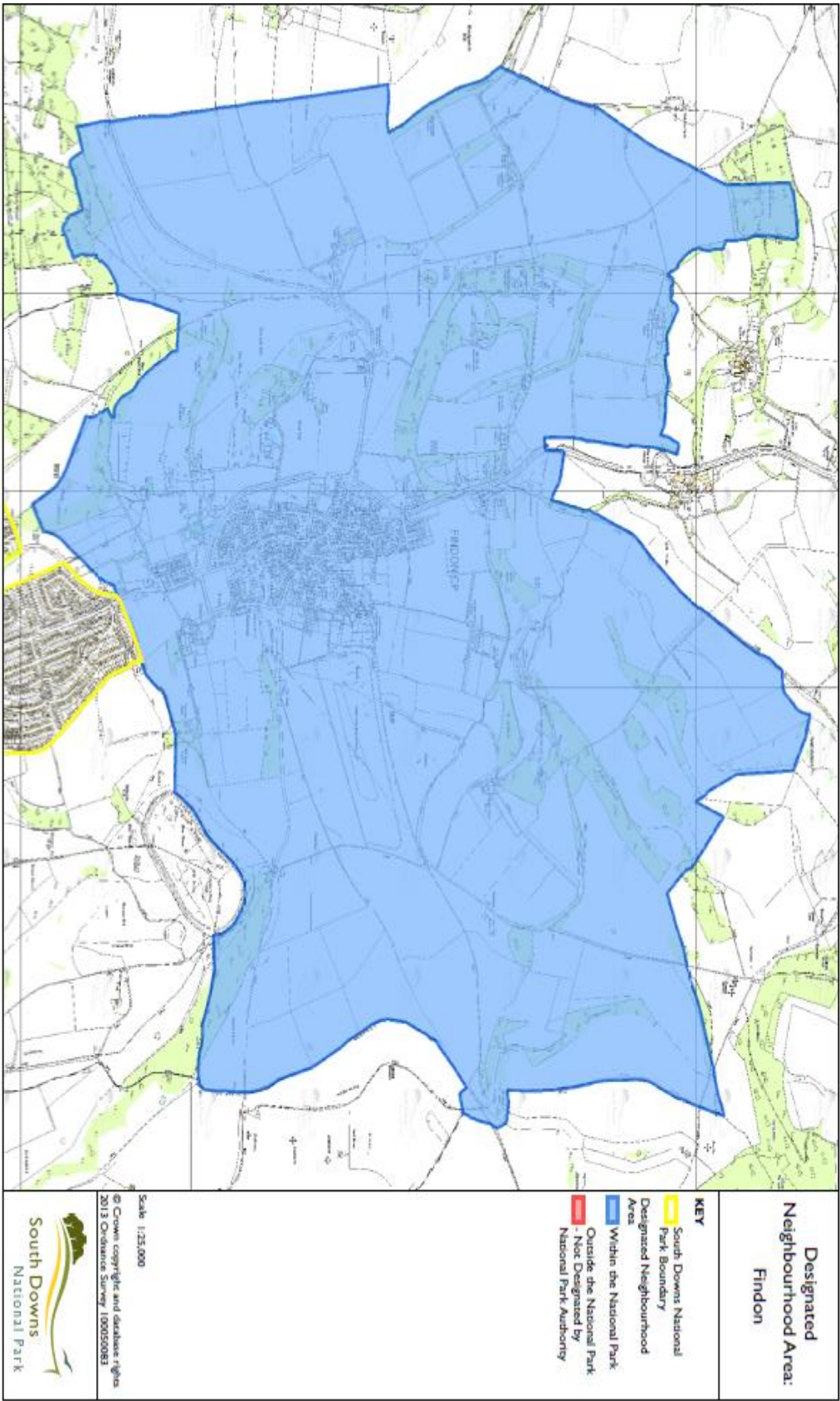
SDNPA Consultees

Planning Policy Manager, Legal Services, Monitoring Officer & Chief Finance Officer. Consultation with statutory bodies has been undertaken by Findon Parish Council.

Background Documents

[SDNPA Pre Submission response to the current Findon NDP](#)
[SDNPA Submission response to the current Findon NDP](#)
[Examiners report for the current Findon NDP](#)
[Evidence base for 2018 updated Findon NDP](#)

Findon Designated Neighbourhood Area



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SDNPA Planning Committee – 9 August 2018

Update Sheet



Agenda Item	Page No	Para	Update	Source/Reason
7	-	-	An amended plan (P117 Rev. B – Proposed Plans and Elevations for Plots 16 to 19) has been submitted showing minor amendments to the proposed flat over the garage (plot 19). These relate to minor alterations to fenestration and the internal layout of the plot.	Amended plan
7	-	-	A revised drainage strategy (2016-D1143-SK302 Rev. F) and drainage calculations were submitted to address the concerns raised by Hampshire County Council as Lead Local Flood Authority (See consultation response below.)	Amended plan
7	-	-	Illustrative drawing (DD118_Y03 - Sketch boardwalk and crossing point) submitted showing how the footpath up to the northern site boundary may appear, to help facilitate a future footpath link from the site to the public house to the north.	New plan
7	-	-	Additional information submitted to support the aforementioned Sketch boardwalk drawing in relation to ecological and arboricultural considerations. No concerns raised.	New information
7	10	Section 4	<p>Design Officer: Holding objection.</p> <ul style="list-style-type: none"> The unit on plot 19 has not changed significantly and still presents a suburban typology. There is a lack of private amenity for this unit. Units 16-19 should be reconsidered. Units 28-30 still present an over intensive approach to what should be part of a transition to the countryside edge. The main problem is the buildings are too close together and so will be read as one large mass. Unit 28 should be removed. A plan showing how the development could link over the stream to connect pedestrians to the pub garden is welcomed. <p>Landscapes Officer: No additional comments to make.</p>	
7	-	-	<p>Two separate letters received from the applicant in response to the Landscape and Design Officers comments and the Parish Council views. The main points are summarised as follows:</p> <p><u>Response to Design and Landscape comments:</u></p> <ul style="list-style-type: none"> The requests to remove plot 28 do not consider the wider issues of viability, or the policy context of the site. If the scheme is to deliver 40% affordable housing and a village hall, it needs to provide 30 homes; and homes at the size put forward. 	Further Information

7	-	-	<ul style="list-style-type: none"> • The design rationale for the flat over the garage (plot 19) has been to create a consistent street scene. The flat over the garage also takes a number of cars away from the street scene. The proposals aim to deliver a range of parking solutions, with on plot parking, small clusters of parking, car barrns, lean to attached garages and detached garages. • In relation to rear garden access, only three properties rely on these types of access. • The proposed materials can be conditioned. • An Energy Report has accompanied the application, which confirms energy demand savings and CO2 reduction via renewables, going above and beyond the requirements of the emerging policy (policy SD48). • Additional drainage details have now been submitted to the Council for consideration. 	Further information
7	-	-	<p><u>Response to the Parish Council comments:</u></p> <ul style="list-style-type: none"> • The Parish note that the new layout is linear, without reference to Stroud Village Design Statement. The Stroud Parish Plan 2013 states that the original settlement pattern of Stroud was linear in fashion and the proposal therefore relates to the historic layout of the local area. • The Highways Assessment prepared by Richard Parker Consultancy on behalf of Stroud Parish Council concludes that there is no road safety issue in relation to the three access points proposed for off-street parking along Ramsdean Road. • The Parish commented that the layby previously included to alleviate traffic has been removed. It is considered that the layby would have a negative impact on the street scene. • The Parish state that plot 28 should be removed or relocated. Plot 28 has already been amended and the green infrastructure would be continued along the whole of the eastern boundary. • The proposed parking arrangement at the village hall (13 spaces) provides a balance between good design and parking numbers. The provision of additional parking would provide an overbearing area of hardstanding. • The Parish would like to see traffic calming measures installed. This has not been raised by Hampshire County Council Highways. • Concerns over site work and site access times can be dealt with through a condition. • Concerns were raised over the presence of slow worms on site. Horses were removed from the land for a period to allow for the ground investigation works required to inform the drainage strategy. Now this work is complete, management of the site has continued and the potential for ecological interest on the site has been reduced. • The Parish have requested further information relating to the revised landscaping scheme. A condition requiring details of hard and soft landscaping can be included within the consent. 	

7	10	Section 4	<p>Additional consultation responses received to the further information on plot 19, drainage strategy and sketch boardwalk drawing (see above):</p> <p>Stroud Parish Council: Local residents are concerned about additional traffic and parking issues. A condition should be attached putting restrictions on increasing parking spaces or extending houses within the development.</p> <p>Officer comment: Certain permitted development rights have been removed under recommended condition 15 (page 27 of the Committee report).</p>	
7	10	Section 4	<p>Hampshire County Council (Lead Local Flood Authority): No objection. The surface water drainage proposals are considered acceptable apart from the maintenance responsibility and this should be conditioned.</p> <p>Officer comment: The maintenance responsibility would be secured under recommended condition 23 (page 30 of the Committee report).</p> <p>Ecology Officer: No objection to the proposed boardwalk. Pre-works check for nesting birds and the vegetation should be undertaken in supervision of an ecologist.</p> <p>Tree Officer: No objection in principle. A detailed Arboricultural Method Statement with tree protection detail required.</p> <p>Officer comment: Additional condition recommended below.</p>	Update
7	12	5.1	<p>Additional representation received</p> <p>Cllr Nick Drew (East Hampshire District Council):</p> <ul style="list-style-type: none"> It is worrying that three access points have been provided along Ramsdean Road and there is a lack of parking, which needs review despite there being no objection from Highways. The community does not require 5 bedroom houses and the number of 4 bedroom houses proposed should be limited. Ratio of open market and social housing should be revisited. 	Update
7	25	Section 10 (Conditions 5 and 6 (part x))	<p>Additional wording added to the conditions below:</p> <p>Condition 5: No development above slab level shall be commenced...</p> <p>Condition 6: Additional criterion below to be included:</p> <p>x) Final construction details of the footpath that is proposed to provide pedestrian access from the village hall up to the northern site boundary, including the footpath route and materials.</p>	

7	24	Section 10	<p>New condition:</p> <p>The use of the village hall hereby permitted shall only take place during the following hours: 07:00 to 23:00 on Mondays to Fridays 08:00 to 23:00 on Saturdays and Sundays.</p> <p>Reason: To protect the amenities of existing neighbouring occupiers and future occupiers of the development, in accordance with policy CP27 of the East Hampshire District Local Plan Joint Core Strategy 2014, policy SD54 and SD5 of the Submission version of the emerging South Downs Local Plan and the revised NPPF (2018).</p>	Update
7	24	Section 10	<p>New condition:</p> <p>Prior to commencement of the section of footpath leading from the village hall to the northern site boundary, a further Arboricultural Method Statement and drawing showing the existing trees in relation to the proposed footpath and any necessary protection measures shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with these details.</p> <p>Reason: In the interests of the amenity of the landscape character of the area, in accordance with policy CP20 of the East Hampshire District Local Plan Joint Core Strategy 2014, policy SD11 of the Submission version of the emerging South Downs Local Plan, the National Park Purposes and the revised NPPF (2018).</p>	Update
8	59	Recommendation	<p>Update:</p> <p>1) That planning permission be granted for the reasons and subject to the conditions set out in Section 10 of this report and subject to the completion of a S106 agreement with obligations relating to:</p> <ul style="list-style-type: none"> • A contribution of £9,920 towards off site affordable housing • Submission of a Management Scheme for the Tourism Accommodation • Restriction of tourism accommodation to ensure not to be used for general C3 residential dwellinghouse. <p>• Tie the tourist accommodation with the dwelling known as House A on the submitted application plans.</p> <ul style="list-style-type: none"> • Securing of Translocation receptor area as part of reptile mitigation strategy <p>That authority be delegated to the Director of Planning to refuse the application, with appropriate reasons if the s106 agreement is not completed within 2 months of the 9 August Planning Committee meeting.</p>	Amendment

8	67	Condition 4	<p><u>Additions to the condition, as below:</u></p> <p>No development shall commence until a Construction Method Statement has been submitted to and approved by in writing by the Local Planning Authority. The approved plan shall be adhered to throughout the construction period. The plan shall provide for:</p> <ol style="list-style-type: none"> I. The provision of long term facilities for contractor parking; II. The arrangements for deliveries associated with all construction work; III. Access and egress for plant and machinery; IV. Location of temporary site buildings, compounds, construction materials and plant storage areas; V. Details of hours of operation; VI. Details of wheel washing facilities. VII. An indicative programme for carrying out the works. VIII. The provision of wheel washing facilities; IX. No burning on site; X. Measures to minimise the noise (including vibration) generated by the demolition/construction process and including hours of work. XI. Details of any floodlighting, including location, height, type and direction. XII. The erection and maintenance of security hoarding. XIII. The routing of vehicles during construction. <p>Reason: To ensure the development is undertaken in a manner which reduces any potential impact upon nearby residential amenities in compliance with the NPPF.</p>	Amendment
8	68	10.1	<p><u>Amendment to condition 8:</u></p> <p>The stables hereby permitted shall only be used for purposes ancillary to the residential use of the dwellings on the site dwelling known as 'House A' and shall not be used for any other commercial purposes (such as DIY livery) or in connection with any form of separate riding establishment.</p> <p>Reason: to enable the Local Planning Authority to control the use of the site in accordance with the NPPF.</p>	Amendment
8	69	10.1	<p><u>Amendment to first sentence of condition no. 14:</u></p> <p>Notwithstanding condition 12 11, there is the possibility that during development unforeseen circumstances may be encountered.</p>	Amendment

8	69	10.1	<p><u>Amendments to condition 16:</u></p> <p>No part of the development shall be first occupied until the road(s), footways, and casual the access and parking areas (including those lay-by parking spaces on South Grove) serving the development have been constructed, surfaced and drained in accordance with plans and details to be submitted to and approved by the Local Planning Authority required to be submitted and approved in conditions 5 and 9 of the planning permission.</p> <p>Reason: To secure satisfactory standards of access for the proposed development.</p>	Amendment
8	70	10.1	<p><u>Additional condition:</u></p> <p>18. The tourist accommodation hereby approved shall not be occupied by any person, group or their dependants, for a period of more than 28 days in any twelve month period. A register of the occupancy of the accommodation shall be maintained and kept up-to-date by the operator, and shall be made available to the Local Planning Authority upon request (within 14 days of a written request being made). It shall record the names and addresses of all visitors and their arrival and departure dates.</p> <p>Reason: This development is only acceptable as holiday accommodation for use by short term visitors to the area. There is a need to ensure that practical and permanent management measures are in place to control the short term visitor accommodation.</p>	Update
9	104	Appendix 1	<p>The caption to Figure 3 of the CAAMP to be amended, with the words “the last” removed and “a” inserted in their place.</p>	To ensure accuracy and consistency with text elsewhere in the CAAMP
10	155	2.9	<p>Delete the final sentence of the paragraph.</p> <p>For that reason the SDNPA are recommending that the updated FNDP is not progressed to submission, and that the current FNDP remains the made Neighbourhood Plan for the Parish of Findon.</p>	The SDNPA are not reporting that the NDP is not progressed. Rather the report highlights the risks of progressing the NDP including allocations.

			3.3	Alter the final sentence paragraph as follows. While there appear to be no immediate issues relating to general conformity with the saved policies of the Arun District Local Plan 2003, there may be issues relating to the FNDP conformity with the Submission SDLP. The updated FNDP proposes a number of alternative housing sites to meet the housing requirement for Findon. These sites are intended to be alternatives to those proposed in the Submission SDLP. However, the SDLP has now been submitted to the planning inspectorate and includes two different proposed housing site allocations and modifications to the existing settlement policy boundary. The updated FNDP proposes alternative housing allocations and alternative modifications to the Settlement Policy Boundary.	To ensure the report is consistent with Counsel Advice at Appendix 4
10	155		3.4	Amend the paragraph as follows: The Submission version of the South Downs Local Plan is now with the planning inspector, who has been sent a copy of this Planning Committee report. At this stage the SDNPA recommend that the updated FNDP does not progress to submission due to the conflicts set out in our response at Appendix 3 , and highlight the potential risk in proposing alternative sites to those proposed in the Submission version of the South Downs Local Plan.	To ensure the report is consistent with Counsel Advice at Appendix 4
10	158	8		Amend the wording in the first paragraph as follows: Findon Parish Council do not take account of the significant concerns raised by the SDNPA in relation to the progression of an updated FNDP. This could result in an updated FNDP progressing to Submission and Examination where there is a risk that the updated FNDP will may fail examination as it is not in general conformity with the policies contained in the Submission version of the SDLP, if some or all of those policies are deemed to be of a strategic nature.	To ensure the report is consistent with Counsel Advice at Appendix 4

SDNPA response to the Pre Submission version of the updated Findon NDP

Page number	Section	Comments	SDNPA Recommendation
Pg.8	Plan Preparation Process	<p>The following section doesn't provide details of how the plan has been prepared. It would be helpful to include details such as how and when a steering group was established, membership of the steering group, subsequent engagement activity and evidence gathering – including details of any reports commissioned by the steering group and how these have informed the Plan. A great deal of this information can be taken from Appendix 7. It would be appropriate for this information to be at the beginning of the plan to allow the reader to understand the context of the updated Findon Neighbourhood Plan (FNDP)</p>	<p>Include details of how the Plan has been prepared, and explain the reason for the updating of the FNDP at the beginning of the document.</p>
Pg.9	Aims of the Plan	<p>This section would benefit from a new heading. The two statutory Purposes and Duty of the SDNPA should be stated in full:</p> <ol style="list-style-type: none"> 1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area 2. To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. <p>The SDNPA also has a duty when carrying out the Purposes to: Seek to foster the economic and social well-being of local communities within the National Park. The Plan should acknowledge that there are limitations to what the FNDP itself can achieve. For example the aims of plan regarding transport cannot be easily addressed by the FNDP. These may be aspirations the Parish Council should seek to achieve though working with for example the Highways Authority. This is particularly relevant in relation to the aspirations set out in the Masterplan for the south west end of Findon. In section HD9.6 the plan makes clear that parts of the master plan are indeed aspirational and cannot be delivered directly by the FNDP</p>	<p>Give section on aims a clear heading. State Purposes and Duty in full. Acknowledge the purpose and limitations of a neighbourhood development plan.</p>
Pg. 10	Statement of Community Involvement	<p>This section should provide a summary of the community engagement undertaken in order to demonstrate how the FNDP has been developed to reflect the views of the community. How were the community involved e.g. surveys, workshops, face-to-face meetings etc. and what were the issues identified by the community? Appendix 7 could be incorporated into this section or reference to appendix 7 made clearly at this section to give the reader a better understanding of the additional consultation that has been carried out to develop the updated FNDP.</p>	<p>Include reference to the summary of community engagement activity and issues raised as set out in Appendix 7</p>

Page number	Section	Comments	SDNPA Recommendation
Pg. 11	Emerging Local Plan	It may be appropriate to set out in this section that the SDLP sets out land allocations to meet the housing requirement set by the South Downs Local Plan for Findon.	Consider including reference here to the proposed allocations in the SDLP
Pg.12	Local Planning Policy	The updated FNDP has deleted the text which referred to the plan being in general conformity with the 2003 Arun Local Plan. Given the uncertainty as to the timing of the adoption of the South Downs Local Plan, it may be that the examination of the Updated FNDP will be tested against the Saved Policies of the 2003 Arun Local Plan and the emerging SDLP, therefore it would be appropriate to reinstate the deleted text.	Consider reinstating deleted text to set out clearly which Local Plan policy the updated FNDP will be examined against
Pg.9	SDNP Local Plan	The inclusion of the SDNP Vision is welcome. It would be helpful to elaborate on Findon's role within the vision for the National Park. For example Findon is a thriving village, surrounded by open downs shaped by sheep grazing and is a village with strong cultural traditions still active today such as the sheep fair. Reference could also be made to the peaceful and tranquil places within the parish and the opportunities to enjoy these, for example via long-distance PRoW including the Monarch's Way.	Expand on how Findon relates to the vision for the National Park.
Pg.15 – 17	History of the Parish of Findon	Maps showing the development of Findon would be helpful here and would illustrate the growth of the village. In addition to Findon Park and Muntham Park, mention could be made of the parkland at Cisbury.	Include maps and photos to illustrate text. This will also help cut down on the amount of text required.
Pg. 18	Community Profile	We recommend that the statistics here could be better presented in graphs or figures. Comparison with West Sussex or the South East would be more relevant and would help the reader to better understand the issues/challenges which are unique to Findon. Comparison with the National Average is not particularly revealing. It would also improve the Plan to include an interpretation of these figures and how they have influenced the development of the FNDP and the future aspirations of the community. Currently they just appear as a series of figures.	Use graphs to show population statistics. Make regional comparisons and provide interpretation of statistics.
Pg. 19-21	Environment and Heritage	It would be helpful to include maps of key designations within the FNDP (possibly as appendices) rather than in the Evidence Base. 3.3.9 – Census data should be provided here to support the statement on housing mix. Details of dwelling size would also be useful here.	Includes maps of environmental designations. Include census housing data.
Pg. 22	3.4.5	Roads and traffic – it is agreed that traffic is a significant issue for the village and it is a significant challenge to address this issue whilst not losing any parking spaces. Given that the crossroads is a critical point in the road system and the core of the existing Conservation	Consider scope for public realm enhancement in core village to address traffic issues.

Page number	Section	Comments	SDNPA Recommendation
		Area, some sort of public realm enhancement/ shared space type scheme should perhaps be considered. This notion could be incorporated into a Conservation Area Appraisal and Management Plan (CAAMP) prepared by the SDNPA and should be supported by FNDP Policy GA6. The FNDP could be more proactive and seek to do a feasibility study looking at the area with the aim of putting a funding package together and implementing the work.	
Pg.29	Policy BT2	Retention of Employment Land Strategic Policy SD35: Employment Land, of the SDLP protects all employment land in the National Park that is fit for purpose.	Review necessity of policy having considered SD35.
Pg.30	Policy BT4	Retention of retail frontages There will be strategic policy and development management policy in the SD Local Plan on this topic. Draft policies SD37 Town and Village Centres and SD52 Shop Fronts should be reviewed to see where FNDP policy can provide additional detail if necessary. The current policy wording appears to undermine one of the aims of the FNDP to protect local shops as the policy currently allows change of use if certain tests can be met.	Review necessity of policy and review policy wording.
Pg.31	BT6 & BT7	Shop front and business signage See emerging SD Local Plan policy SD52 Shop Fronts. Can policies BT6 and BT7 be combined? Also ensure there is no conflict between these two policies.	Review necessity of policy or review wording and combine policies.
Pg.31	BT8	Support recreational and tourism activities There will be strategic policy and development management policy in the SD Local Plan on this topic. Draft policy SD23 Sustainable Tourism should be reviewed to see where FNDP policy can provide additional detail if necessary. The current policy wording should also refer to adverse impacts on wildlife and cultural heritage.	Review necessity of policy or review policy wording
Pg.31	BT9	Communications infrastructure This policy suggests general support for communications infrastructure which includes telephone masts. Appropriate caveats should be included to protect the National Park special qualities. There will be a development management policy in the SD Local Plan on this topic. Draft policy SD44 should be reviewed to see where FNDP policy can provide additional details if necessary.	Review necessity of policy or review policy wording
Pg.34	GA1	Connection to sustainable transport, local networks and green infrastructure The current policy refers to the Community Infrastructure Levy (when adopted) the SDNPA	Review policy wording

Page number	Section	Comments	SDNPA Recommendation
Pg.35	GA4	<p>Community Infrastructure Levy is now adopted so the wording of this policy needs to be updated.</p> <p>A24 Improvements This is not a land use policy that would be used in the determination of the planning applications. The measures referred to in the policy are all highways works. In the examination of the original Findon NDP the examiner considered that this policy should be removed from the FNDP and placed in a supporting document which set out aspirational policies, therefore the qualifying body should consider whether it is appropriate to include GA4 as a land use policy within the FNDP This policy should also be reviewed (if it is to remain as an aspirational policy) in relation to the Masterplan for south west end of Findon and the aspirations for the A24 set out in that part of the plan. Currently the aspirations set out in the master plan are not reflected in this policy</p>	<p>Policy does not relate to land use matters and therefore should be removed from the main FNDP Consider reviewing policy in light of master plan proposals for south west end of Findon.</p>
Pg.35	GA5	<p>Traffic Management This is not a land use policy that would be used in the determination of the planning applications. The measures referred to in the policy are all highways works. In the examination of the original Findon NDP the examiner considered that this policy should be removed from the FNDP and placed in a supporting document which set out aspirational policies, therefore the qualifying body should consider whether it is appropriate to include GA4 as a land use policy within the FNDP</p>	<p>Policy does not relate to land use matters and therefore should be removed from the main FNDP</p>
Pg.38	CFW5	<p>Protection of assets of community value The final sentence of the policy needs clarifying – what is a ‘reasonable price’ and it is unclear what service trade uses are. Emerging SD Local Plan policy SD43 <i>New and Existing Community Facilities</i> should be referred to in reviewing this policy.</p>	<p>See SD Local Plan policy SD43 and revise policy wording.</p>
Pg.39	CFW6	<p>Local Green Space Further clarification is required in relation to Local Green Space 8. The text on page 75 suggests that this site is a ‘twitchen’ and a Historic quiet lane along with the associated verges. It is assumed that the verge is what is proposed for Local Green Space designation, but this should be clarified in the text and supporting map. Local Green Space 9 also requires further clarification as to what is being designated? Consideration should be given to whether the designation of footpaths / ‘twitchens’ is appropriate, especially as the Planning Practice Guidance clearly states that linear corridors should not be designated as Local Green Space simply to protect Rights of Way which are already protected under other legislation</p>	<p>Consider reviewing the policy text and map in relation to Local Green Space 8 and 9</p>

Page number	Section	Comments	SDNPA Recommendation
Pg.39	CFW8	<p>Unlit Village status Clarification is required for the unlit village status. Further information is required to help explain this status and the implications for future planning applications. The policy should be reviewed in light of emerging SDNP Local Plan Policy SD8: Dark Night Skies</p>	Review or consider the need for the policy in light of emerging Local Plan Policy SD8: Dark Night Skies
Pg.40	ESI	<p>Gaps between settlements In the original FNDP this policy was removed from the plan by the Examiner and placed in a supporting document which set out aspirational policies, whilst the qualifying body may feel it is appropriate to include this policy within the updated FNDP, the points below should be considered.</p> <p>The Arun 2003 Local Gap policy will be superseded by the SD Local Plan. To future-proof this policy reference should be made to emerging strategic policy SD4 <i>Landscape Character</i> which refers to the protection of existing undeveloped gaps between settlements. If the Qualifying Body would like this local gap status to remain they should consider a specific policy to set out protection of gaps between settlements.</p> <p>The policy currently refers to map 2 which now appears to have been deleted in the updated FNDP. Clarification is sought as to whether Policy ESI will be retained. This is particularly important as the Local Gap as set out in the current FNDP and the Arun Local Plan will be in conflict with allocation HD10 which seeks to allocate the land for housing development, although it is within the current protected gap.</p> <p>The policy reference in the supporting text requires updating to refer to Policy SD4 not SD5 as currently stated.</p>	<p>Consider whether it is appropriate for this policy to remain in the FNDP given the issues highlighted below</p> <p>Review and future-proof policy.</p> <p>Consider whether this policy will remain in the updated FNDP given the allocation of housing site HD10</p> <p>Update policy reference</p>
Pg.40	ES2	<p>Surface water management The SDNPA is the approval body for SUDS and will make the decision on the suitability of sustainable drainage provision in consultation with the Lead Local Flood Authority (WSSC). There will be development management policy in the SD Local Plan on this topic. Draft policy SD50 <i>Sustainable Drainage</i> should be reviewed to see where FNDP policy can provide additional detail if necessary.</p> <p>Also, the policy is not clear when a Flood Risk Assessment will be required and appears to imply one is required for all development proposals which is not in line with NPPF paragraph 103.</p>	Review necessity of policy or review policy wording

Page number	Section	Comments	SDNPA Recommendation
Pg.41	ES3	Protection of trees and hedgerows There will be development management policy in the SD Local Plan on this topic. Draft policy SD11 Trees, Woodland and Hedgerows should be reviewed to see where FNDP policy can provide additional detail if necessary. Policy ES3 is currently very generic and doesn't contain anything locally specific to Findon.	Review necessity of policy or review policy wording
Pg.42	ES4	Renewable Energy There will be development management policy in the SD Local Plan on this topic. Draft policy SD51 Renewable Energy should be reviewed to see where FNDP policy can provide additional detail if necessary. Policy ES4 is currently very generic and doesn't contain anything locally specific to Findon.	Review necessity of policy or review policy wording
Pg.43	ES5	Buildings and structures of character Title of text is missing the word 'Special'. Policy ES5 contains a list of "Buildings and Structures of Special Character" which were so identified by Arun DC. These are what are more normally referred to as "Local Listings". The criteria against which these buildings have been tested should be clearer and, ideally, should be those which the SDNPA will be using when we put together a SDNPA Local List. WE have recently invited the Parish Council to engage in the preparation of criteria for local listings, so the Qualifying Body may want to consider adopting the criteria identified by the SDNPA, or submitting these sites to the future consultation on local listings. It would be helpful to keep all the policy text and list of buildings in a single policy box.	Provide details of criteria for local listing. Put all policy text into a single text box.
Pg.43	ES7	Flint Walls It would be helpful to compliment this policy with example photos and a map of the flint walls identified for protection. Should the policy also support proposals to retain and enhance flint walls?	Support policy with photos and map of protected flint walls.
Pg.44	HDI	Spatial plan of the Parish The SDNPA actively promotes and supports community led planning, including the preparation of Neighbourhood Development Plans (NDP). The SDNPA invested considerable resources (financial and officer time) in the preparation of the current 'made' Findon Neighbourhood Plan. This plan chose not to allocate sites to meet Policy SD26 of the SDLP. The Findon NDP Examiner stated in his report that it could only proceed to referendum with several changes being made to the plan and on the understanding that the SDNPA would allocate sites for housing development in Findon in the SDLP. Therefore the SDNPA allocated two sites in Findon in the Pre-Submission version of the Plan namely SD71: Land at Elm Rise, Findon and	The South Downs Local Plan Submission version (SDLP) proposes approximately 28 dwellings to be provided in Findon, excluding windfall development. This figure reflects the capacity of the two sites proposed for allocation in the SDLP, and

Page number	Section	Comments	SDNPA Recommendation
		<p>SD72: Soldiers Field House, Findon. Following this, the Qualifying Body indicated that they were not supportive of the SDLP proposed allocations and would seek to update the FNDP, to include housing allocations. This decision came at a relatively late stage in the preparation of the SDLP. A member of the FNDP addressed the Planning Committee in June 2017 when it considered the draft Pre-Submission Local Plan. Members did not remove any of the Local Plan allocations from the Plan. The SDLP was submitted to the Planning Inspectorate in April and includes two site allocations for Findon.</p> <p>This presents the unusual situation whereby the updated Pre-Submission FNDP and the Submission SDLP are proposing different housing allocations to meet the housing provision figure set in Policy SD26 of the SDLP. The updated FNDP clearly states that the site allocations proposed by the FNDP are not in addition to those proposed by the SDNPA, but are presented as alternative housing allocations. This is matter that the Local Plan Inspector may choose to raise in his Matters and Issues that are due shortly. It is also likely that it is a matter that will be raised by the FNDP Examiner if the Plan reaches examination. Legal advice has been sought on the matter which we hope can be provided to Planning Committee as an update.</p> <p>We set out the SDNPA position in relation to the proposed site allocations below, however, it is worth highlighting at this stage the potential risk in FNDP seeking to allocate sites in addition to the SDLP allocations. The updated FNDP includes four site allocations to meet the housing provision figure set in the SDLP. These are different sites to those allocated in the Submission SDLP. There is a risk that all proposed allocations could be allocated in the respective plans and in turn granted planning permission for development. This would result in a much higher level of development for the settlement of Findon than that proposed as appropriate in the SDLP.</p> <p>The SDLP also proposes an alternative amendment to the Settlement Policy Boundary to that proposed in the FNDP. This also presents a risk that all proposed modifications to the Settlement Boundary could be agreed resulting in significantly higher levels of growth for the settlement.</p> <p>In conclusion it is considered that the Qualifying Body should consider carefully their decision to progress with the updated FNDP, given the risks set out above. This matter is likely to be considered in the examination of the SDLP, however, a decision may not be forthcoming in time for the submission of the updated FNDP. These concerns have been made clear to the Qualifying Body previously in correspondence.</p>	<p>should therefore be carried through to the FUNDP to ensure consistency with the SDLP</p>

Page number	Section	Comments	SDNPA Recommendation
45	HD1.5	<p>This paragraph should be amended to reflect the SDLP Strategic Policy SD27: Mix of Homes, and in particular paragraph 7.40 of the supporting text to SD27. We would encourage that the FUNDP sets out a clear approach based on local evidence, or alternatively that the housing mix set out in Policy SD27 is used, subject to robust local evidence of an alternative housing mix being provided at application stage. The current approach risks uncertainty and a potentially weak negotiating position at the application stage.</p>	<p>Amend text to reflect the approach set out in Policy SD27 of the SDLP</p>
Pg.46	HD2	<p>Local Connection</p> <p>As currently worded policy HD2 will only require the local connection criteria to be applied on the first occupation of the affordable home, therefore the local connection will not remain in perpetuity.</p> <p>Recommend criteria (f) is a separate stand-alone policy regarding agricultural dwellings. Such a policy may not be necessary as it is already sufficiently covered by Local Plan policy.</p> <p>Any Local Connection policy should be in line with Arun DC's local connection criteria which in the draft Arun Local Plan states:</p> <p><i>The Local Planning Authority will base its assessment of identified housing need on the Housing Register and other available up-to-date housing needs assessments.</i></p> <p><i>Development will be considered to contribute towards meeting an identified need, where it will provide accommodation for any of the following:</i></p> <ul style="list-style-type: none"> • <i>existing residents of the parish requiring separate accommodation;</i> • <i>persons who have long standing family links (immediate family only e.g. parent, sibling or adult child and step relationships) with the parish;</i> • <i>Grandparents, grandchildren, aunts or uncles and non-adult children will be included only where the District Council considers it necessary for the applicant to be accommodated within the Parish in order to provide or receive medical or social support to or from such a relative;</i> • <i>persons with full time employment based within the parish;</i> • <i>persons who have had to move away from the parish due to a lack of affordable housing, but would like to return;</i> <p><i>Permission granted in these cases will be subject to a S106 agreement which includes safeguards that the scheme provides for the identified local need and will continue to do so in perpetuity.</i></p>	<p>Consider review of policy wording.</p> <p>Consider removing of specific policy criteria</p> <p>Check conformity with housing authority approach to local connection policy</p>
Pg.46	HD3	<p>Live / Work units</p> <p>It is not clear where this policy applies – within the settlement boundary or elsewhere?</p> <p>Caveats should be included to protect amenity and prevent against the loss of large areas of garden/green space.</p>	<p>Review policy wording.</p>

Page number	Section	Comments	SDNPA Recommendation
Pg. 48	HD6	<p>HD3.3 reads as policy criteria and should be included in the policy text rather than the supporting text.</p> <p>Edge of Boundary Houses and Paddocks This is not a land use policy that would be used in the determination of the planning applications. In the examination of the original FNDP the examiner considered that this policy should be removed from the FNDP and placed in a supporting document which set out aspirational policies, therefore the qualifying body should consider whether it is appropriate to include HD6 as a land use policy within the FNDP</p>	Policy does not relate to land use matters and therefore should be removed from the main FNDP
Pg. 49	HD7	<p>Design of Development The Qualifying Body should consider reviewing the Village Design Statement (VDS) and submitting it to the SDNPA for consideration as a Supplementary Planning Document, to ensure it is afforded the maximum weight in the determination of planning applications. Currently the VDS will only be considered a material consideration through its reference in the FNDP.</p> <p>The policy wording refers to the Village Design Statement at Appendix 4, the correct reference would be to Appendix 5.</p> <p>Include Village Design Statement as part of the Evidence base, or make it a full appendix to the FNDP.</p>	<p>Consider a review of the VDS</p> <p>Correct reference to appendix</p> <p>Include a full copy of the VDS with the plan or make the appendix available on the webpage</p>
Pg.50	HD9	<p>Masterplan for the south west end of Findon The proposed masterplan is noted. Substantive comments are provided in relation to the allocation sites below. The SDNPA has a major in-principle concern regarding the landscape impact of the scale and location of development envisaged by the masterplan, particularly in terms of the significant change to settlement form and extension of built form towards Worthing (Findon Valley) along the A24 corridor. The area is also on the opposite side of the A24 and is therefore largely detached from the settlement form, notwithstanding aspirations to mitigate the barrier effect of the A24. It is also noted that elements of the masterplan are aspirational, and we would therefore question the overall deliverability of what is envisaged.</p>	Qualifying body consider whether it is appropriate to progress these site allocations given the progression of the SDLP
Pg 53	HD10	<p>Southern part of Paddocks at Garden Centre This site forms the southern part of SDNPA SHLAA Site AR008, and is not considered suitable for allocation. The site is removed from the existing settlement of Findon, with the barrier of</p>	Consider deletion of Policy HD9

Page number	Section	Comments	SDNPA Recommendation
Pg. 57	HD11	<p>the main A24 dual carriageway being particularly problematic. Development would not relate well to the existing settlement in terms of access to local services, and would not fit with the character of the settlement form as currently exists. SDNPA also questions the effectiveness of part 2 of the policy, which suggests significant uncertainty as to whether the site is or is not allocated, or the form that development would actually take.</p> <p>This allocation conflicts with Policy ESI of the updated FNDDP. Policy ESI (Gaps between Settlements) resists development in this important gap. It is noted that map 2 (showing the gap) is deleted from the updated FNDDP, however, policy ESI remains in the body of the updated FNDDP, and therefore conflicts with this proposed allocation. C</p> <p>Former allotments north of the Quadrangle</p> <p>The Former Allotments site (SDNPA SHLAA site AR009) is not considered suitable for allocation. The site does not relate well to the existing settlement pattern, and the main A24 dual carriageway creates a major barrier that divorces the site from the main settlement. The SHLAA landscape assessment found the site to have medium-high landscape sensitivity, and contributes to the local gap between the village and Worthing. The assessment concluded that development on the site would have a potential adverse impact on the character and appearance of the landscape.</p>	Consider deletion of Policy HD10
Pg. 61	HD12	<p>Housing allocation on land north of Nightingales</p> <p>The land north of Nightingales is not considered suitable for allocation. There are potential significant issues of poor amenity for future occupiers, due to the site's close proximity to the heavily trafficked A24 (a 50mph speed limit is in operation at this point). There is also potential for negative impact on the landscape, as the built form of the settlement would be extended out beyond its current natural boundary at this point.</p> <p>Policy HD12 indicates that a successful development would rely on undergrounding of overhead power cables, new vehicle access and parking, proposals to mitigate the effects of traffic noise and a very high proportion of affordable housing which represents a potentially significant constraint to delivery. Therefore it is considered that the sites proposed for allocation in the SDLP are more suitable. If the issues highlighted (and potentially others) can be mitigated, it is considered that the site may have scope to come forward as a rural exception site, given it is a greenfield site outside the existing settlement boundary.</p>	Consider the deletion of Policy HD12. Further consideration could be given to the site coming forward as a Rural Exception site.
Pg.65	HD13	<p>Housing allocation on the former fire station site</p> <p>The former Fire Station is a site of 0.1 hectares within the settlement boundary, which is currently in use as an ambulance station. It is considered likely to be too small a site to</p>	Consider the deletion of Policy HD13, allowing the site

Page number	Section	Comments	SDNPA Recommendation
68	HD14	<p>comfortably accommodate 5 or more dwellings, and therefore should not be considered for an allocation site. The site is within the settlement boundary, hence any future residential development on this site would be acceptable in principle and classed as windfall development.</p> <p>Extension of Settlement Boundary The SDNPA has in-principle concerns regarding the allocation sites proposed in the FUNDP, and has itself proposed two sites in the SDLP on the edge of the settlement that will necessitate a revised settlement boundary. It follows that the SDNPA does not support the settlement boundary proposed in Policy HD14 and shown on Map 2A.</p>	to come forward as Windfall development in the future
Pg.69	Supporting Evidence	<p>Dates should be given for evidence documents. Supporting evidence should be made available on the NDP website.</p> <p>Background documents – South Downs National Park Partnership Management Plan (2012). Remove repetition of Flood and Water Management Act. Also include reference to the Pre – Submission South Downs Local Plan and DEFRA Vision & Circular on English National Parks.</p>	Consider the deletion of Policy HD14
Pg.72	Appendix 2	<p>Show Local Green Spaces on a map in the document. LGS protection of PRoW is unnecessary as they are afforded separate protection. We'd also question whether PRoW and small areas of verge meet the LGS criteria as set out in the NPPF, in particular can such verges be considered to be demonstrably special.</p>	Provide links to supporting evidence.
Pg. 77	Appendix 4	<p>It would assist the reader if there was a map showing the location of the flint walls to allow applicants / decision makers to clearly see where Policy ES7 should be applied</p>	Review Local Green Space designations, particularly LGS 8 & 9 to ensure they comply with the requirements of the NPPF.
Pg. 85	Appendix 5	<p>Reference to policy HD8 is incorrect, the reference should be to HD7</p>	Provide map to assist the reader in applying Policy ES7
Pg. 87	Appendix 7	<p>Consideration should be given to the inclusion of this text in the plan preparation section, where it set the context for the updated FNDP for the reader</p>	Amend wording
Page 91	Map 2.	<p>This map is shown as deleted in the updated FNDP. However Policy ES1 remains in the updated FNDP, therefore the reference to Map to remains in the body of the FNDP, although it appears the map is proposed to be deleted</p>	Consider moving text to the main body of the FNDP
Pg. 90, 92, 93, 94	Maps	<p>It is proposed that all the material shown on these individual maps is included on one policies map so it is easy for the reader to establish where spatial policies are mapped</p>	Clarify whether Map 2 should be reinstated to support Policy ES1 Consider the preparation of a composite policies map to support the FNDP

IN THE MATTER OF THE FINDON NEIGHBOURHOOD PLAN

ADVICE

Introduction

1. I am asked to advise the South Downs National Park Authority (SDNPA) in respect of an issue arising in respect of the application of the National Planning Policy Framework to a potential conflict between an emerging Neighbourhood Plan and the emerging South Downs Local Plan.
2. In 2016, the Findon Neighbourhood Development Plan (“NDP”) was made. The NDP did not allocate any sites for housing development. It currently forms part of the development plan for the SDNPA’s area. I am instructed that the examiner found that the NDP was satisfactory only on the basis that the emerging South Downs Local Plan (“SDLP”) would in due course allocate sites for housing development in Findon.
3. The SDLP has now been submitted for examination. The submission draft allocates two sites for development in Findon. There is some local resistance to these proposed allocations, and work has commenced on a new NDP which would allocate sites for housing as alternatives to those included in the SDLP. The new NDP is currently out for consultation, and the intention of those proposing it is that the new NDP will supersede any allocations made in the SDLP. It is assumed that the SDLP will be adopted and the new NDP will be made in 2019.
4. I am asked to consider whether both sets of allocations will be extant policies to be used in the determination of planning applications for the respective sites or whether set of allocations will supersede the other. If the latter, I am asked to consider which would take precedence.

Analysis

5. It is trite law that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan includes the development plan documents (taken as a whole) which have been adopted or approved in relation to that area and the neighbourhood development plans which have been made in relation to that area (see s 38(3)).
6. Section 38(5) Planning and Compulsory Purchase Act 2004 makes express provision for circumstances where successive elements of development plan policy conflict with each other as follows:

“(5) If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.”

7. The 2018 National Planning Policy Framework (“NPPF”) sets out a presumption in favour of sustainable development. It then provides as follows:

“12. The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

13. The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.

14. In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:

- a) the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;
- b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement;

- c) the local planning authority has at least a three year supply of deliverable housing sites (against its five year housing supply requirement, including the appropriate buffer as set out in paragraph 73); and
- d) the local planning authority's housing delivery was at least 45% of that required⁹ over the previous three years."

8. Paragraph 11(d) is a reference to "where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date".

9. The NPPF then continues:

28. Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.

29. Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.

30. Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.

10. It seems to me that paragraphs 28-30 of the NPPF seek to give clear priority to neighbourhood plans for non-strategic site allocations, but that they also reflect the position in s 38(5) PCPA 2004. That is because when a neighbourhood plan is made which conflicts with an earlier non-strategic policy in a local plan, the statutory provisions give priority to the later neighbourhood plan in any event.

11. That assumes, however, that the policies are in fact in conflict (and that the SDLP is adopted before the NDP). It is conceivable that a site allocation in the SDLP may not directly conflict with an alternative allocation in the NDP, and thus that both could in principle be relied upon by developers. This position would not be clearly resolved

through paragraph 14 of the NPPF, since in such circumstances both policies would be up to date.

12. It follows that in my view, those preparing the NDP would have to ensure that (a) the NDP is made after the SDLP is adopted and (b) that it expressly supersedes and is inconsistent with the SDLP allocations if they were to achieve the desired effect. If the NDP was adopted before the SDLP, then the SDLP would supersede it. The greatest risk, to my mind, is that the plans are not clearly inconsistent, but both allocation different land for development with the consequence that an excessive amount of development is directed to Findon through two separate sets of site allocations.
13. Please do not hesitate to contact me in Chambers if I can assist further on this issue.

Richard Turney
Landmark Chambers

27 July 2018

From: Charles costello [REDACTED] 
Subject: FW: UPDATED 2018 FINDON NEIGHBOURHOOD PLAN
Date: 9 August 2018 at 12:19
To: unpwg.findonparishcouncil@gmail.com



From: Charles costello [REDACTED]
Sent: 09 August 2018 12:13

Subject: FW: UPDATED 2018 FINDON NEIGHBOURHOOD PLAN

Sent: 09 August 2018 08:52

Subject: FW: UPDATED 2018 FINDON NEIGHBOURHOOD PLAN

Please find my representation re the above with attachments

Charles Costello



The Clerk

Findon Parish Council
34 Normandy Lane
East Preston
West Sussex
BN16 1LY

Dear Sirs,

I write to voice my concerns over the Local Green Space (LGS) designation shown as No 8 in the 2016 Findon Neighbourhood Plan and, in particular, the strip of land between Paddock Way and Westview Terrace. The same land is also shown in the Regulation 14 Pre Submission 2018 Updated Neighbourhood Development Plan, which seeks to provide clarification on the designation of the No. 8 in addition to its primary purpose of allocating housing sites. I am the owner of the said land. As the owner of this land Paragraph: 019 Reference ID: 37-019-20140306 of the National Planning Policy Guidance (NPPG) states that the 'qualifying body' (in the case of neighbourhood plan making) "should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space." The 'qualifying body' in this case being Findon Parish Council and, in particular, the appointed working group.

I have to say that I was never informed personally by Findon PC nor was I contacted by anyone representing Findon PC or their NP Working Group working on the 2016 Plan.

This is a fact because the Lead of the 2018 Working Group David Hutchison has now

acknowledged that there is no Findon PC record of contacting me regarding the intention of FPC to designate my land.

In the 2016 Findon NP it was not even listed as Local Green Space under Appendix 2 : "Local Green Spaces", which actually described No. 8 as "8. The Sussex Twittens between Holmcroft Garden and High Street, Cross Lane and the High Street and Soldiers Field to Braeside Close". In my opinion my land was wrongly included as LGS as it became jumbled up with the mention of various Twittens of which my Private Land is clearly not. All the land listed in the 2016 as LGS is either Community/Council/ or Resident Association owned or in the case of Findon Cricket Club owned by the Club themselves.

In the 2018 proposed Amended Findon NP the aforementioned Twittens in the 2016 have now taken on the dual titles of "Twittens and Quiet Lanes" although we are told that West Sussex County Council, the designating Council, do not have do not a "Quiet Lane Policy " in place to preserve and enhance Quiet Lanes??

In the case of the now so called Quiet Lanes of West View and Northview Terraces they are Privately owned and controlled by the owners of those respective properties which form the Terraces. The same also applies right down to Cross Lane and are not technically Public thoroughfares.

Turning to Paddock Way and its Roadway, up to the end of the Leylandi Trees/Hedge is owned by myself including the wrongly designated Local Green Space. As I have said Paddock Way is a wholly owned Private Road and is a Cul de Sac and as such the public do not have access to it other than to visit houses in that Close which is clearly indicated on a board which was erected during the 1960's not many years after the houses were built and still remains standing. There is no footpath that exits to anywhere.

As far as the wrongly designated Local Green Space on my land [NP 2016] and the now attempt to tidy up the designation in the to be updated NP 2018 the Guidance and Protocols the 2018 NPPF and the 2014 NPPG should apply in the form of "Appendix 2 Policy CFW6 LISTED IN 1-8.

1] In close proximity :- To what? It is private land with no Public rights of access.

2] Demonstrably special :- How is it ? It comprises of a very tall range of Leylandi trees [would have been taller if I had not allowed the residents of Paddock Way to lop them 5 yrs ago].

3] Beauty [see 2]

4] Historic significance :- These trees were only planted in the 1970's and are not a Native Species and clearly not of any Historical value as claimed in the section headed " Clarification to locations numbered 8 " in the updated 2018 NP. The sheer presence of an oversized Leylandii hedge can hold not historical or cultural significance whatsoever.

5] Recreational value :- How can there be? The land is full of dense Leyland trees and the public have no access rights over it. It is acknowledged, however, the FPC are not claiming that 5 applies.

6] Tranquility :- How can it be it is between two Private Roads and end on on to a Public Highway .

7] Ecology] Please read SDNPA Ecologist Report later in this letter. The land in question holds no biodiversity value at all.

8] Local in character :- As I have said the trees are not native and I am not aware of any other 25ft high non-native Leyland hedges in Findon Village.

I made a Planning Application about 15 to 16 months ago totally unaware of the fact that my land had been designated a "Local Green Space ". The application only sought permission for a small one bedroom bungalow which, by virtue of its size alone, made it an affordable property for any young Native Resident of Findon as an ideal 1st home or possibly for an elderly person/couple looking to downsize and in doing so freeing up a family home in the village. This application was refused primarily because it was on a piece of land that had become " Local Green Space " that was defectively formulated and wrongfully applied in the 2016 Neighbourhood Plan.

After the first refusal of my application I then submitted an amended version relocating the proposed 1 bedroom bungalow slightly and relocating the single car parking space. Furthermore, and in the interests of proactive working as encouraged by the NPPF, I sought to address the LGS issue in a creative way which, in my opinion constituted special circumstances. I submitted a comprehensive landscaping plan for the remaining land (around 50%). Not only would I have re-landscaped this area in the most prominent location at the junction of Westview, Paddock Way and Nepcote Lane with native species of high biodiversity value, I was also prepared to gift this land to Findon Parish Council as part of a S.106 Legal Agreement. Whilst the quantity of the designated LGS would have been reduced, the quality of the area would have been greatly enhanced. It seems ironic to me that the resultant LGS, including native species, higher ecological value, public access and controlled by the community would actually fulfil more of the 8 criteria listed above compared to the current situation.

Again as before, Findon PC objected as a Statutory Consultee and the application was refused by SDNPA primarily as it was designated as a Local Green Space in the defectively formed and wrongfully applied Local Green Space of the 2016 Neighbourhood Plan.

Please find enclosed or attached various reports numbered 1 to 9 I had to have done for the Planning Applications also there are various reports from Statutory Consultees relating to the Intrinsic value of my land in Paddock Way in terms of Ecology and the Status of the trees thereon.

1] Landscape and planting plan.

2] Impact on Trees and Local Green Space.

3] PJC Tree Survey

4] Arboricultural Impact Assessment.

5] PJC Method Statement.

6] SDNPA Arboricultural Report.

7] SDNPA Ecology Report.

8] Ecology Report.

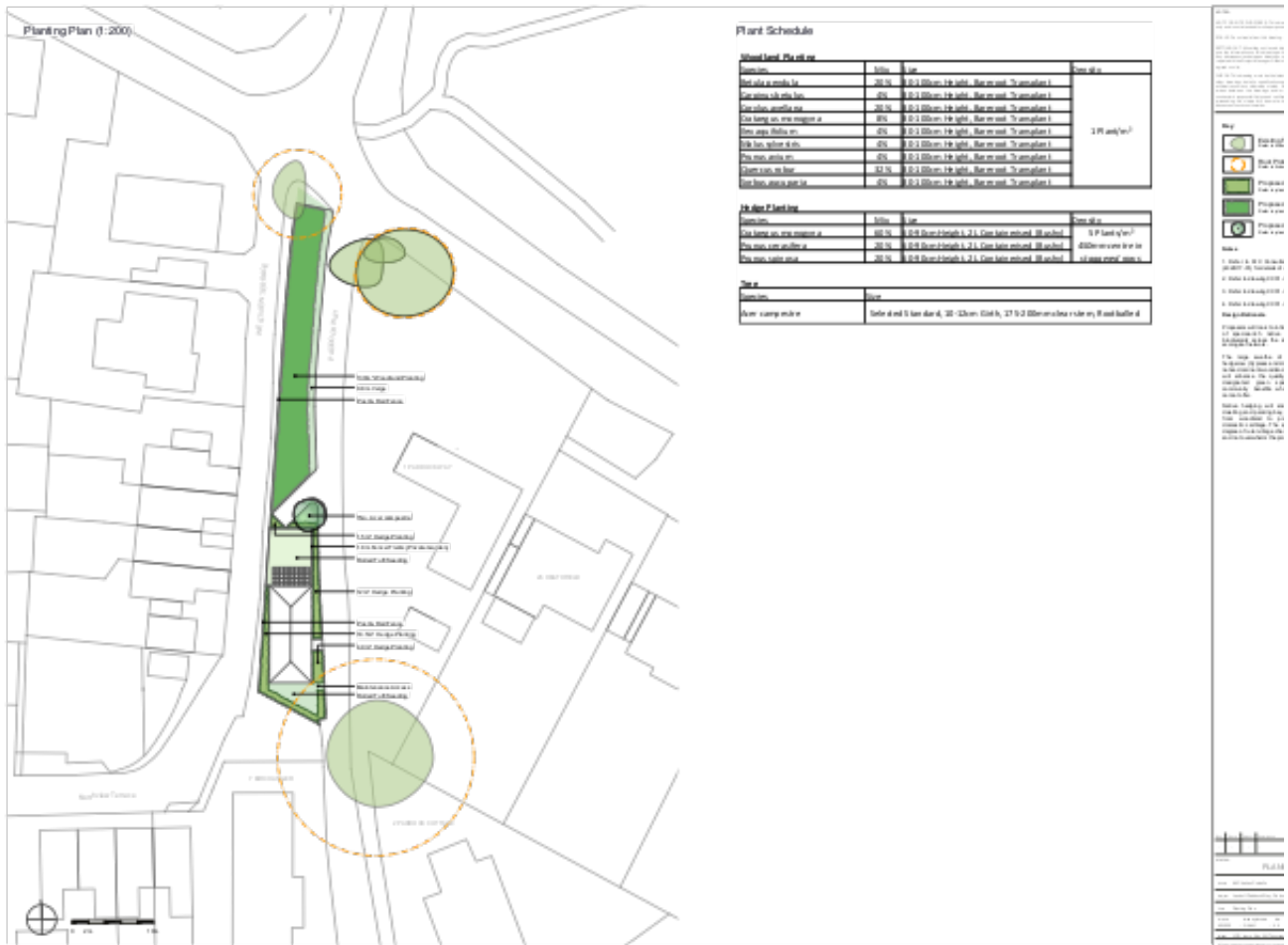
9J Clarifications to locations numbered 8.

As far as the setting out the proposals the for land to be allocated for long overdue extra housing in Findon is a positive step in restoring and maintaining the vitality of any Village and Findon should be no exception well done to your working party for achieving at least so far the proposal for inclusion in the 2018 NP.

Please could you acknowledge receipt of this e-mail.

Regards

Charles Costello



- 2. LGS summary from Pl...ent.pdf
- 3. Tree Survey.pdf
- 4. Arboricultural Implica...ent.pdf
- 5. Arboricultural Metho...ent.pdf



Name: Mike Bird

Date: 14 March 2018

Application reference: SDNP/18/00213/FUL

Location: Land adjacent to 1 Paddock Way, Findon, Worthing, West Sussex, BN14 0TX

Proposal

Proposed detached bungalow; vehicular access off Paddock Way (revised scheme)

Assessment

The only significant tree that appears to be affected by the proposal is a mature London plan, identified as T3 on the plans and in the supporting arboricultural reports. Whilst, the proposed cross-over / drive would encroach into the tree's root protection areas (based on BS5837 guidelines), the volume of root zone affected is relatively minor and, subject to the precautions recommended in the arboricultural implication study and method statement, I would not anticipate significant long-term impacts on the tree. A detailed engineering specification, to be approved prior to implementation and arboricultural supervision is required.

Service runs are an unknown and, whilst there is no obvious need for them to be routed through the tree's RPA, the routes should be subject to prior approval to ensure that there is no encroachment.

The mixed western red cedar hedge serves as a visual screen between the properties on the adopted road at Westview Terrace, and those on the unadopted road at Paddock Way. However, the proposal to replace it with a native woodland planting mix would be an improvement in terms of biodiversity and more in keeping with a village setting.

Recommendation

If consent is granted, the following conditions are recommended:

No development shall commence until the following details have been submitted to, and approved by, the local planning authority:

- a full specification of hard surfacing to be constructed within the root protection area of the London Plane (T3), prepared by a qualified engineer (with arboricultural input); and
- a plan showing the routing of service runs (to avoid the root protection area of T3).

The approved details shall be implemented in full and tree protection and arboricultural supervision provided in accordance with the recommendations set out in the Arboricultural Method Statement, prepared by PJC Consultancy (ref: 4328/17-02/3 Rev 1)

Reason: to ensure reasonable measures are taken to avoid damage to a protected tree in the interests of visual amenity.



7. HCC
ECOLO...t 1.pdf

Thank you for consulting me. I have now reviewed the email from Barbara and Tony Brimyard dated 15 February. The email refers to an "Ecological Report submitted by the applicant on 13th February". I am not aware of any ecology reports by the applicant in support of the application and I can only assume that there has been a misunderstanding between the HCC Consultation Response and that submitted by the applicant. Nevertheless, my comments in relation to the concerns raised in relation to foraging and commuting bats is detailed below:

In my previous consultation response I stated that it was my understanding that the existing cypress hedge along the north-eastern boundary will be removed and replaced by 130m² of woodland planting (Drawing No: CC01-01B and Planting Plan no:GA-001). In terms of biodiversity, this is supported as a more diverse habitat will replace a species-poor hedge. Whilst it is acknowledged that the existing hedge could provide a small resource for commuting/foraging bats, the removal of this feature will be short-term as in the long-term, the biodiversity benefits for wildlife and particularly foraging and commuting bats will be enhanced. Furthermore, the recommended planning condition requests a scheme of biodiversity enhancements to be submitted and approved by the LPA prior to the commencement of the development, which will further result in biodiversity benefits. Review of recent GIS mapping indicates that there are treelines along the existing roads (e.g. Nepcote in the north) and within the nearby residential gardens (north-east direction). Therefore, I have no major concerns that the removal of this species-poor hedge and its replacement with a wooded belt to the north and new hedge planting along the eastern, western and southern boundaries of the site will result in any significant adverse impacts in the local bat population.

Please do contact me if you need any further information.

Kind regards,
Maral

Please note that this advice is given in accordance with the Service Level Agreement that has been signed between Hampshire County Council and your Council. The comments within this letter are expressed as a professional view provided to South Downs National Park Authority and should not, therefore, be interpreted as those of Hampshire County Council.

Clarification to locations numbered 8.

8. The Sussex Twittens between Holmcroft Garden and High Street, Cross Lane and High Street, Soldiers Field to Braeside Close and green landscaped surroundings to historic 'quiet lanes' Cross Lane and to West View and North View Cottages.

The Twitten and historic 'quiet lanes' are special to many parts of Britain and are described as either a narrow path between walls and hedges or a historic narrow lane between hedgerows and trees where these features form an integral part of the character and tranquility of the 'quiet lane'. In Findon these twittens and 'quiet lanes' are important features in the rural character of the village and help provide safe, informal links between different parts of the village.

At present WSCC, the designating authority, do not yet have a 'quiet lane' policy in place to preserve and enhance quiet lanes.

The 'quiet lane' leading from Cross Lane to West View and Northview Cottages relies on its tranquility and historic character from the green margin of land between the 'quiet lane' and the access road to the mid 20C residential development in Paddock Way. Maps from the late 1800s show this green margin of land with trees separating the access to Nepcote Lodge

stables (now Maddock Way with the mid 20th century converted stables at the southern end). This gives the 'quiet lane' and its green margin its historic character linked with the highly valued equine heritage of Findon.
0.20 ha NPFF: 1,2,4,6,7,8

From: Anna Gillings anna@gillingsplanning.co.uk 
Subject: Representations to Findon Neighbourhood Plan
Date: 9 August 2018 at 15:31
To: unpwg.findonparishcouncil@gmail.com
Cc: Rupert Stephens rupert.stephens@hobden-group.co.uk, Rachel Lamb rachel@gillingsplanning.co.uk

AG

Dear Sirs,

I write in response to your current public consultation regarding the revised draft Findon Neighbourhood Plan.

Background

These representations have been prepared by Gillings Planning on behalf of Hobden Asset Management Limited, the owners of Soldiers Field House (the site allocated for residential development under Allocation Policy SD72 in the draft South Downs National Park Local Plan). We note that this allocation has not been included in the revised draft NP, at odds with the emerging Local Plan. Our client objects to the omission of the Soldiers Field site from the draft plan and we set our comments on this below.

It should be noted that the Town and Country Planning Act 1990 sets out the basic conditions that must be met by a Neighbourhood Plan before it can be put to a referendum. Condition a. states that plans must have *“regard to national policies and advice contained in guidance issued by the Secretary of State”*. Part d. states that the plan should contribute *“to the achievement of sustainable development”*.

The newly revised National Planning Policy Framework (NPPF) states that plans should be *“positively prepared, in a way that is aspirational but deliverable”* (paragraph 16).

Commentary

Both our client and the SDNPA consider the Soldiers Field House site to be suitable, available and achievable and as such could deliver residential development within a short timescale. The site has been robustly assessed as part of the Local Plan preparation process which confirms there are no insurmountable constraints to development on the site. Taking into account the extensive assessment and consultation work, the Authority is proposing to allocate the site in its Local Plan.

Planning Practise Guidance states that *“A neighbourhood plan can allocate additional sites to those in a Local Plan where this is supported by evidence to demonstrate need above that identified in the Local Plan. A neighbourhood plan can propose allocating alternative sites to those in a Local Plan, but a qualifying body should discuss with the local planning authority why it considers the Local Plan allocations no longer appropriate”* (Paragraph: 042 Reference ID: 41-042-20170728).

It is not clear, other than as a result of additional community consultation work, why the Neighbourhood Plan Forum considers it no longer appropriate to allocate the Soldier’s Field site, in direct conflict with the robustly prepared emerging Local Plan. Furthermore, we are concerned about the appropriateness of a number of the sites allocated by the Neighbourhood Plan particularly in terms of their conformity with the existing and emerging Local Plan and perhaps more importantly their deliverability.

We would question, in particular, the allocations HD10 and HD11 noting that these were assessed in the 2016 SHLAA and rejected on the basis that they *“would not*

reflect the character of the surrounding area in terms of settlement form, and would not provide adequate access to local services”.

We would also raise questions about the inclusion of site HD13 on the basis that it is currently in use for employment purposes (as an ambulance servicing company). The draft revised NP states that the emerging Local Plan makes no provision to retain an employment use on this site however this is incorrect. Emerging strategic policy SD35 clearly seeks to protect existing employment sites (as does adopted policy EMP DM1 in the Arun Local Plan) and as such, this allocation is not in general conformity with the strategic policies of the development plan, as stipulated by the revised NPPF.

Further, the planning practise guidance states that “*Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new Local Plan*” (Paragraph: 009 Reference ID: 41-009-20160211). Given the emphasis of the revised NPPF on housing delivery, if the Neighbourhood Plan Group feel strongly about allocating these alternative sites, a more appropriate solution would be to allocate these as reserve sites, in addition to those already proposed in the Local Plan, to ensure emerging evidence of housing need is addressed.

We trust this is of assistance. We would be very happy to discuss this with you further if required.

We would be grateful to receive confirmation of receipt of these comments.

Kind regards,

Anna Gillings

Managing Director
Gillings Planning

DDI - 02382358870

Tel – 02382358855

Gillings
Planning

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Luken Beck

30 Carlton Crescent, Southampton SO15 2EW
Tel: 023 8063 3440
www.lukenbeck.com



Email only: unpwa.findonparishcouncil@gmail.com

10 August 2018

Dear Updated Neighbourhood Planning Working Group (UNPWG),

Representation raising an objection: Updated Findon Neighbourhood Development Plan Consultation (Regulation 14)

Luken Beck act on behalf of Seaward Properties, in respect of their land interests at Land at Elm Rise, Findon.

These representations are submitted to the Pre-Submission Draft of the Findon Updated Neighbourhood Development Plan 2018 – 2035, Regulation 14 Consultation, which is running from the 23 June until 10 August 2018. This has been held in accordance with the Neighbourhood Plan (General) Regulations 2012.

Unfortunately, it is our professional opinion that the Findon Updated Neighbourhood Plan as currently written fails to meet the basic conditions required by the Regulations. Seaward Properties is therefore seeking a further opportunity to proactively engage with the working group to address concerns they have and identify public benefits which a residential allocation at Elm Rise could bring (alongside those already highlighted such as new footpath connections, affordable housing provision, sustainable urban drainage and the potential to soften the existing housing in wider views to the north-east).

Background



The original Findon Neighbourhood Development Plan 2014 – 2035 was prepared from December 2012 until it was 'made' in December 2016 by the South Downs National Park Authority (SDNPA).

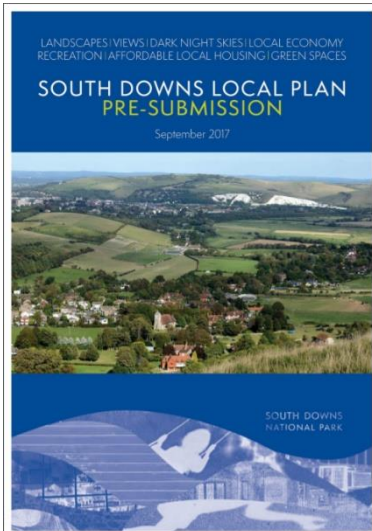
However, despite encouragement from the Local Planning Authority and other stakeholders, it failed to positively plan for its identified housing need. This inability to identify sites for future housing led to the Examiner deleting a number of policies as these would prejudice the village from meeting its housing requirement and did not meet the basic conditions required by the Regulations. The Examiner concluded in his summary that

"The consequences are, that the allocation of housing sites and the establishment of a new settlement boundary that will accommodate rather than constrain the Parish's present and future housing needs, will now pass to the SDNPA. After careful consideration I conclude that there is sufficient sound policy in the remainder of the Plan to allow me to recommend that it proceed to referendum but without the key housing policies"

Examiners Report, 5 August 2015

At the time, the SDNPA provided reassurance that they would make the required residential allocations (in a similar way to other settlements in the National Park where there is not a Neighbourhood Plan) and this was noted in the Examiners report

Given the date of the saved policies from the Arun District Local Plan (2003) which plan period ran until 2011 (adopted prior to the NPPF), the Examiner saw some merit in the remaining policies subject to modification. The Neighbourhood Plan then proceeded to referendum and subsequently adopted on this basis.



Following this decision, the SDNPA subsequently reviewed a range of sites and made two housing allocations;

- SD71 Land at Elm Rise, Findon to deliver 15 – 20 dwellings; and
- SD72 Soldiers Field, Findon to 10 – 12 dwellings

These two housing sites formed part of the Pre-Submission South Downs Local Plan (September 2017) that underwent public consultation in the Autumn 2017. Whilst acknowledging the Parishes concerns, both allocations formed part of the Submitted South Downs Local Plan (April 2018), scheduled for examination in November 2018. Some very minor modifications have been made regarding the anticipated housing figure apportioned to Findon in the strategic policy SD26 relating to the supply of homes, with the provision of approximately c.28 dwellings. The policy SD71 for the housing allocation at Elm Rise reduced slightly to a range of between 14 – 18 dwellings (a reduction of 2 dwellings).

The forthcoming South Downs Local Plan Examination is the best forum for the merits of the allocations to be debated, as opposed to this late challenge. The summary of representations received within the SDNPA Consultation Statement indicate that a total of 8 comments were received directly on policy SD71 Land at Elm Rise, which were both positive and negative (the former from the parish, UNPWG and adjoining residents/owners that use the field for grazing).

The emerging South Downs Local Plan has taken into account public comments received during the course of its preparation and has now reached an advanced stage, with the examination to commence in November 2018.



Allocation Policy SD71: Land at Elm Rise, Findon

1. Land at Elm Rise, Findon is allocated for the development of between 15 and 20 residential dwellings (class C3 use). Planning permission will not be granted for any other uses. Detailed proposals that meet the following site specific development requirements will be permitted:

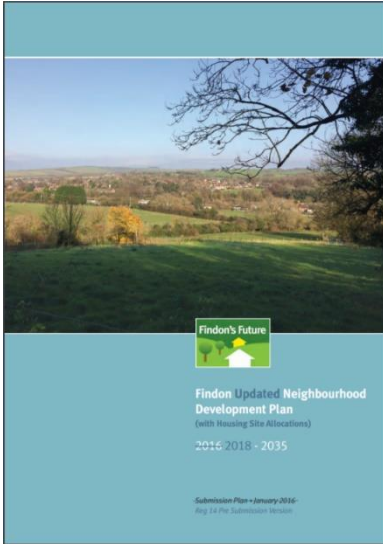
- To enhance biodiversity, and in particular provide for local notable and protected species;
- Development should be focused on the western and southern parts of the site, and provide a suitably landscaped transition to more elevated areas;
- Demonstrate no significant harm to be caused to groundwater resources;
- Vehicular access should be provided via existing access from Elm Rise; and
- The development should provide public green space integrated with an attractive, publicly accessible through-footpath and cycle link between Elm Rise and the northern end of Stable Lane.

2. In order for the development to have an overall positive impact on the ability of the natural environment to contribute to ecosystem services, development proposals must address the following:

- Protect and enhance trees within the site where possible, and where trees are lost, provide at least the equivalent in new tree planting on site. Trees on the site boundary should be retained and new tree planting should be undertaken;
- Minimise hard surfaced areas on site, and use permeable surfaces and soft landscaping where possible to maximise infiltration of water and reduce surface water run-off; and
- New planting should be suitable for pollinating species.

South Downs Pre-Submission Local Plan (September 2017) + Modifications = Submission Local Plan, April 2018

Updated Findon Neighbourhood Development Plan (UFNDP)



The reason behind the update is stated in the UFNDP flyer/introduction to the Regulation 14 Pre-Submission Version Consultation;

'In response to community aspirations that sites allocated for housing should be in less sensitive landscape locations, an Updated Neighbourhood Development Plan has been prepared, which includes housing site allocations to meet the housing requirement proposed for Findon in the submitted version of the 2018 SDNPA Local Plan, in full'

Updated Neighbourhood Plan Working Group (UNPWG), June 2018

The South Downs are aware that the allocations are not the preferred sites by the parish and the UNPWG are seeking alternative sites that are detached from the village on the southern side of the A24 which will give rise to landscape concerns (as indicated in the SDNPA response to the consultation, published within the Planning Committee Agenda for 9 August 2018, agenda item 10 and appendixes). The SDNPA raise concerns specifically to the new allocations, Policy HD9 Masterplan and policy HD11 Housing allocation on part of Land south of the Garden Centre.

These specific housing allocations and masterplan alongside the settlement boundary extension to the south, is not in line with the National Park statutory purposes and duty (Environment Act 1995) which states;

Purpose 1: To conserve and enhance the natural beauty, wildlife and cultural heritage of the area

Purpose 2: To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public

Nor is this in line with the community's objective of finding alternative sites that are '*less sensitive landscape locations*'.

Therefore, the Neighbourhood Plan does not comply with the first basic condition which is to have regard to National Policies and guidance, due to the proposed amended settlement boundary or its chosen residential allocations to the south of the A24.

Review of the reference to swapping the residential allocation to the existing garden centre if its replacement building or refurbishment is not financially viable in the long-term is questionable as to whether this is a sound policy (Housing Allocation HD11). The access arrangements are also not straight forward for either of these southern allocations and highway issues will need to be addressed. Depending on the outcome of these discussions with the Highway Authority, the access arrangements (including the link road) could also have negative landscape implications (resulting in the removal trees). We are not aware of any technical notes to support the allocation especially given works associated with the A24. The allocation at HD10 does not appear to be a logical rounding off the settlement or expansion.

The new National Planning Policy Framework (NPPF2) published in July 2018, paragraph 172 states that;

'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks....which have the highest status of protection in relation to these issues'.

Again, we are arguing that in light of our landscape evidence undertaken (enclosed with this letter) and the comments from the SDNPA that the proposed allocations are not suitable, which includes a major in-principle concern to the masterplan shown in policy HD9.

It is also important to note that it is our professional opinion that the updated Findon Neighbourhood Development Plan in its current form, is not in conformity with the strategic policies of the emerging Local Plan (in terms of its proposed allocations given their lack of suitability in terms of landscape implications and poor relationship the existing settlement pattern) and the proposed sites limited potential to achieve sustainable development currently. Furthermore, some of the housing allocations are situated within the current strategic and local gap (Area 6 and 11) policy ES1 in the Arun District Local Plan 2003. This is intended to be carried forward by the Updated Plan, therefore there is some conflict between the aspirations of retaining the downland village as distinctively separate from the wider suburbs of Worthing to the south.

Policy HD12 Housing Allocation on Land north of Nightingales raises question about deliverability issues and Policy HD13 Housing Allocation on the Former Fire Station site would be counted as windfall if the site becomes available for development in the future.

It is suggested that Policy HD14 Extension of the Settlement Boundary is amended to show the whole settlement boundary for clarity, with the allocation at Elm Rise (ideally 3b as per the Local Plan Allocation or the alternative site 3a has potential of delivering wider community benefits as shown in the pre-application submission concepts attached), alongside any additional changes sought. This would ensure that the updated Neighbourhood meets the basic conditions set by the Regulations.

We would also like to highlight our concerns regarding policy HD6 Edge of boundary houses and paddocks. This policy was previously removed from the current Findon Neighbourhood Development Plan at the request of the Examiner and included within the Community Aspirations Document. This is not a land-use planning policy and should remain in a Community Actions or Priorities Plan or similar (as currently done).

There is also no guarantee that the Updated Findon Neighbourhood Development Plan will proceed following examination (if it is found to meet the basic conditions) or succeed at referendum. Therefore, this further highlights the importance of proceeding with the current allocations within the Local Plan. Otherwise this leaves Findon village open to speculative planning applications. In addition, if the Updated Neighbourhood Plan proceeds in its current form, it potentially opens up the updated Findon Neighbourhood Plan to legal challenge.

Pre-Submission Consultation Statement

The Pre-Submission Consultation Statement (Appendix 7) states that two housing preference surveys were carried out. The first survey was carried out following a consultation day in August 2017. Seaward Properties were represented by its design team at the event, illustrating how residential development could be achieved at Elm Rise.

Whilst Elm Rise was not ranked as the preference by locals, this site showed the ability to accommodate the most housing, with affordable housing provision unlike the alternatives due to their limited capacity (generally much smaller and would not be required to make affordable housing provision on site).

A copy of the survey used is shown below. It is unfortunate that a more interactive method of recording comments and suggestions from the public was not undertaken. We do not agree with the landscape sensitivity rating of 'high' coloured in a red shade, for Map reference 3B Paddock East of Elm Rise.

Following these results, another preference survey was carried out which included further sites on the southern side of the Garden Centre/A24. However, it is very disappointing that both allocated sites within the emerging Local Plan (including Elm Rise) were not included in this second survey.

The reasons given were;

“On the advice of the professional survey analyst the three least preferred sites, by some way, from the first preferences survey were not included in the second survey, not least to minimise respondent irritation”

Appendix 7, Updated Findon Neighbourhood Development Plan - Regulation 14 Pre-Submission Version

This approach did not give respondents the ability to make the suitable comparisons between all the available sites. Further compounded by the fact that the two of the three sites not included had already been indicated as draft housing allocations. This methodology does raise some concerns. It should be an open process for which residents can make their views known, ideally with some space to write freely any further comments.

Professional advice could have been sought from the LPA or experience of other communities who have carried out Neighbourhood Plans and whether they proactively exclude sites in consultation exercises.

Survey can also be found at www.surveymonkey.co.uk/fr/FindonHousingSurvey or use the QR code

Landscape sensitivity	Relation to Built-up Area	Proposal (Mitigating Features)	No of Dwellings	Your Rank (1-8)
Please rank the housing sites in order of preference, your most favoured as 1 and your least as 8, please note all sites must be ranked.				
MAP REF 20 ATLANTA/MAYLAND				
Slight	Inside	Two hunglows demolished, new 2 and 3 bed market houses. (Landscape screening to adjoin rear gardens)	4	
MAP REF 3B PADDOCK EAST OF ELM RISE (SDNPA DRAFT LOCAL PLAN SITE ALLOCATION)				
High	Outside	Market housing, flats and affordable housing at higher density than Stable Lane and Beech House (new public footpath through site to top of Stable Lane)	20	
MAP REF 19 FORMER FIRE STATION				
Slight	Inside	Existing building demolished, new 1 and 2 bed flats (in converted farm yard and barn style)	5	
MAP REF 13 MONARCHS WAY FIELD VILLAGE HALL END ONLY				
High (field as a whole)	Outside	2 and 3 bed market and affordable houses (Tree and hedge screening to rest of field, contribution towards replacement pre-school, access from rear of Village Hall)	12	
MAP REF 15 FIELD NORTH OF NIGHTINGALES				
Slight	Outside	2 and 3 bed, market, self-build and affordable houses (improved access, additional parking for Nightingales and for the Oval in part of the grassed Oval)	11	
MAP REF 5C FIELD EAST OF PONY FARM				
Moderate	Outside	3 market houses, 1 shared ownership SUBJECT to review of access	4	
MAP REF 7 SOLDIERS FIELD HOUSE (SDNPA DRAFT LOCAL PLAN SITE ALLOCATION)				
High	Outside	Existing former Ryan Price house demolished, new 4 and 5 bed market houses, 3 bed shared ownership houses, at higher density than surrounding area (Beech hedge retained until new landscape screening reaches maturity)	11	
MAP REF 16 FORMER ALLOTMENTS NORTH OF QUADRANGLE				
Moderate	Outside	Part of allotment only, with new allotments 3 and 4 bed market houses, 2 and 3 bed affordable houses, at surrounding density (up to 10 new allotments provided on rest of site, requires drastic improvement to existing access to A24, new footpath through site towards Black Horse)	10	

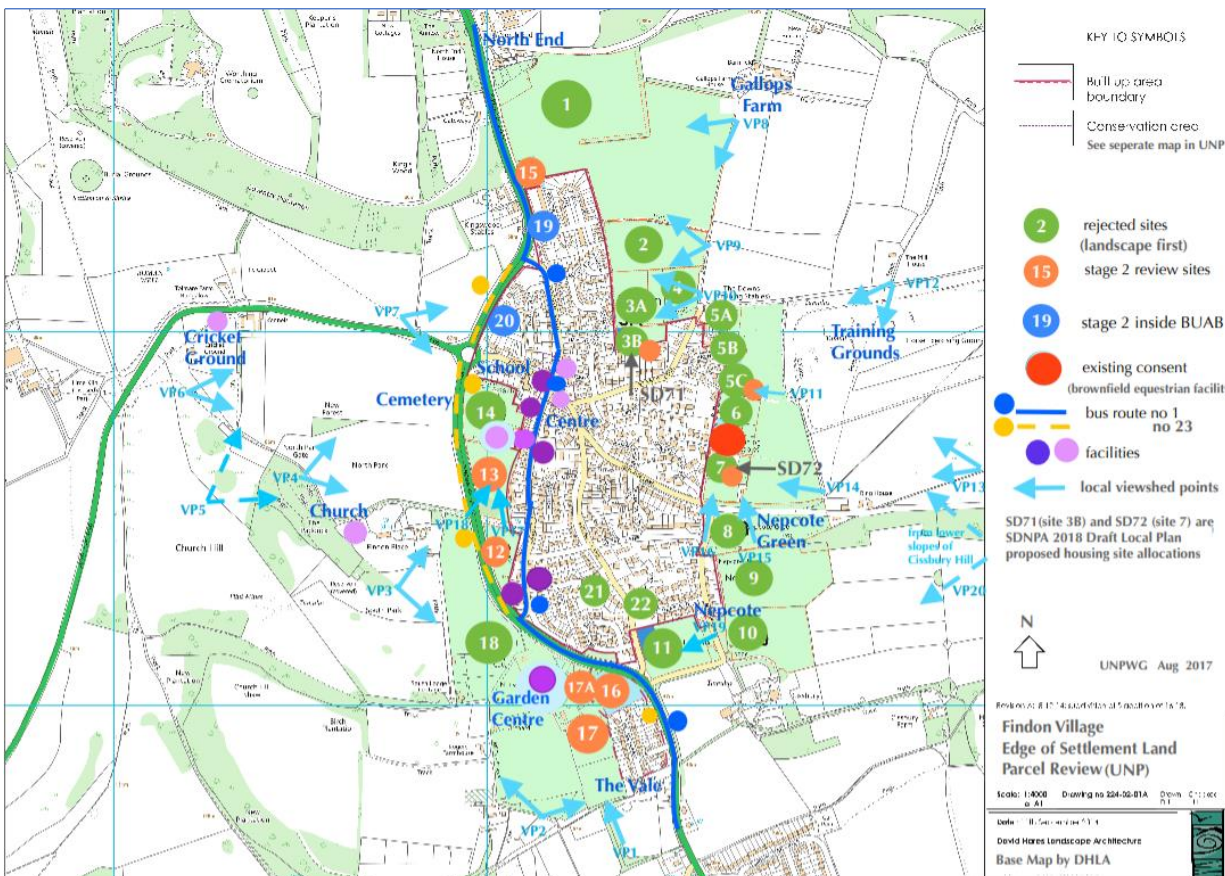
Copy of first Survey produced in August 2017

The UNPWG Allocations Summary indicates that Land at Elm Rise was rejected due to a deliverability issue, relating to surface water drainage which we strongly disagree with. The site is not within an area identified to be at risk of flooding by the Environment Agency and is therefore appropriate for residential development (please see the representations made to the Pre-submission South Downs Local Plan enclosed).

Whilst acknowledging local residents concern due to surface water run-off (mostly due to the topography) experienced outside of the development site, any new scheme will include Sustainable Urban Drainage (SUDs), as shown in the latest concepts for the pre-application submissions and any future planning application will incorporate a strategy to ensure all specialists are satisfied, in consultation with residents.

It is also important to note this second preference survey has a much lower response rate (216 survey returns compared to 450 in the first survey) so it is not clear whether this is representative of the whole community's view. It is our professional opinion that Land at Elm Rise continues to be the most sequentially preferable in landscape terms when reviewing all available and deliverable sites in Findon.

The relevant land holdings at Elm Rise have been referenced as 3a and 3b on the Findon Map showing all site land parcels put forward for consideration prior to August 2017 below. The site reference 3b has been allocated in the emerging South Downs National Park Local Plan.



Findon Village Edge of Settlement Land Parcel Review (UNP) August 2017

Land at Elm Rise, Findon

Benefits of the residential Allocation Policy SD71, Land at Elm Rise (Submission Local Plan)

Land at Elm Rise is the sequentially preferable site to accommodate the identified housing need of Findon and, accordingly, has been allocated by the SDNPA for residential development in the emerging South Downs National Park Local Plan.

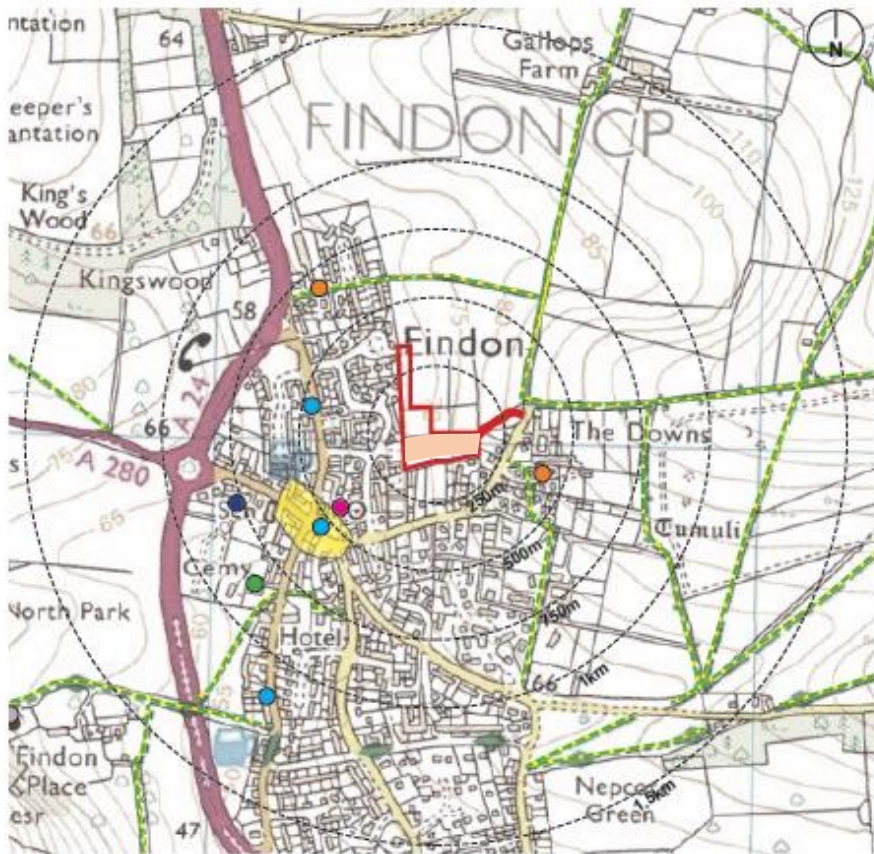
The allocated site constitutes a rectangular shaped parcel of land that is currently utilised, alongside the adjoining fields to the north, as part of a wider agricultural holding for grazing. Whilst, due to the topography of the land, the site is of little agricultural value it is encompassed on three sides by residential development. The

allocated site has mature tree and hedgerow boundaries to help integrate new housing into its wider context and given its relationship to existing built-form, is considered a logical infill development.



Birds eye view of Land at Elm Rise, Findon (Source: Bing)

The site is located sustainably close to the centre of Findon with good public access. The site is within walking distance of a range of local services, facilities and transport links including St Johns Baptist Primary School, Findon Village Hall and other leisure facilities including shops and restaurants. The site also benefits from being close to a network of public rights of way which the proposal seeks to make direct connections to bringing recreational opportunities.



Site Amenities Plan

- KEY
- Site
 - Shops
 - Bus stop
 - School
 - Place of worship
 - Hospital/health services
 - Post Office
 - Village Hall
 - Public Right of Way
 - Allocated Site, Policy SD71



- Existing Public Rights of Way
- Existing access points to Site

Constraints

- 1 Glimpsed visibility of the eastern part of the Site from Public Rights of Way on rising land west of Findon.
- 2 Glimpsed visibility of rural character from north of Findon Conservation Area.
- 3 Tree Protection Areas to west and south-west Site boundary and their root protection areas.
- 4 Mature native hedgerow with small trees along the substantive part of the northern boundary and their root protection areas.

Opportunities

- 1 Provision of a footpath link to the open downs from Elm Rise and Downsview Avenue through to Stable Lane.
- 2 Public view provided from the footpath link, east of the Site towards the G1 Listed Saint John the Baptist Parish Church to the south-west.
- 3 Tree lined hedgerows planted or reinforced. Comprised of wild cherry, aspen, downy birch, crab apple, field maple, hawthorn, hazel, dogwood, elder, honeysuckle and białar rose whips with standard feathered english oak trees for immediate structure for proposed hedges.
- 4 Soften the current urbanising effect of large properties on elevated ground along Stable Lane in views from rising land west of Findon through introducing a tree belt about the eastern end of the Site, with additional benefits on slowing surface water flow across the landform.
- 5 Maintain the rural qualities perceived in glimpsed views from along the northern footway of Lime Road, between the cross-roads with Horsesham Road and along Elm Rise towards Horsehoe Close through introducing wide grass verges throughout the Site along this visual alignment.

Landscape analysis has been undertaken on behalf of Seawards (by Lizard Landscape Design and Ecology Consultants), which accords with the results of the SDNP Authorities' own analysis, that demonstrates that not only does the site have the best capacity of all those in Findon to accommodate landscape change but also provides opportunities to enhance the wider landscape character of the area alongside new footpath connections.

"The development proposals will preserve the special qualities of the South Downs National Park, whilst increasing opportunities to the public to experience access to the scenic qualities through the introduction of new public right of ways from which includes a view towards the Grade I Listed Saint John the Baptist Church and links to the wider footpath network[Furthermore has the] potential to integrate built form into the landscape and improve the setting of Findon...due to the enclosed nature of the site".

Lizard Landscape Design and Ecology, 2017

Planning Officers at the SDNPA have reviewed the alternative allocations proposed in the Updated Neighbourhood Plan consultation, but these have raised landscape issues, do not relate to the existing settlement pattern and some are even questionable whether these are deliverable due to the associated constraints. This is all consistent with previous call for sites the South Downs have carried out, where by nearly all sites were rejected (apart from one considered windfall). Please see our representations made to the Local Plan enclosed.

An initial landscape strategy plan has been produced by Lizard Landscape Design (shown on the previous page and within the supporting information) which identifies the sites constraints and opportunities.

The design will be landscape-led with a clear Green Infrastructure Strategy that enhances the ecological value of the site. This will be informed by conceptual evidence which is being undertaken (see chapters 5 and 6 of the pre-application supporting statement) following discussions with the South Downs National Park and wider stakeholders in due course. The landscaping scheme will involve pollinating species and include permeable surfaces where ever possible.

A high-quality design and conceptual layouts have been produced to demonstrate how a development could be achieved in accordance with all the emerging policies of the Local Plan and the relevant policies of the currently adopted Findon Neighbourhood Development Plan (2016). This included the suggestion of exploring the field to the north of the allocation site by the Updated Neighbourhood Plan Working Group at a meeting held in January 2018. They indicated that they would consider this idea within the Regulation 14 Consultation as the wider parcel of land could bring other advantages, such as providing the opportunity for some land to be retained for grazing of horses or open space, ability to follow the existing contours along the lower parts of the site and provision of community allotments or orchard (if this is desired). The land to the north of Elm Rise allocation could also accommodate all if not a significant proportion of the housing apportioned to Findon and improve the settlement edge with the wider countryside.

Feedback from the local community has also been incorporated into the design concepts alongside affordable housing provision. This has been detailed in both our representations to the Local Plan and the current pre-application under consideration. Further liaison with the community will be carried out in due course as the detailed design is developed, alongside the identification of any other benefits development at the site could facilitate. e.g. scope to improve the local pre-school facilities

Please see the pre-application supporting statement for further details, which includes a planning assessment of the proposals, alongside information about Housing Need in Findon. This includes reference to the Housing Needs Survey (HNS) carried out in 2013 alongside information obtained from the Housing Authority (Andy Elder, Arun District Council) whom maintains the Housing Register. As of June 2018, there were 42 households identified in Findon requiring affordable housing, which is higher than the 24 households identified within the HNS in 2013. This does not include households that would be legible for shared ownership properties. It is therefore crucial that any emerging allocations include provision of affordable housing to address some of this identified need, a benefit of the sites being promoted at Elm Rise, as opposed to the smaller sites being promoted elsewhere in the village.

Concept Plan One – Allocation Site



Concept Plan Two - Land to the north of the current allocation at Elm Rise



Illustrative Layout One – Allocation Site of Elm Rise



Key features:

- 1 Vehicle access provided from Elm Rise in similar location to the existing gate
- 2 Public Open Space provided along the north-eastern boundary with tree planting to soften views of the existing houses to the north of the site along Stable Lane
- 3 Footpath connections established to the north leading to Downview Road
- 4 Footpath connections can be incorporated to the east making direct links with Stable Lane which leads to the centre of the village or the wider public rights of way networks which heads north and eastwards
- 5 Apartments and semi-detached houses located in the lower part of the site, with development becoming less intense on the more elevated parcels, containing mostly detached dwellings
- 6 The creation of a new enhanced settlement edge would be provided by planting native hedgerows and trees along new footpath provided to the north
- 7 Retention and strengthening of existing hedgerows and trees on the boundaries, will only part removal for the creation of the access to the north. Mitigation planting to the west of the new access route will be included
- 8 Possible attenuation pond forming part of Sustainable Urban Drainage with wildflower mixture in the south-west corner (lowest part of the site) positioned away from mature trees and their associated root protection areas
- 9 Variety of car parking solutions used ranging from one plot parking with either garages or car barns and a small unallocated parking area for the apartments
- 10 Formal native hedgerow to support pollinators used to mark boundaries within large rear gardens or along front gardens to increase wildlife opportunities across the site and add seasonal interest
- 11 The creation of generous rear gardens with supplementary planting backing onto the existing dwellings and their associated gardens along Stable Lane and Kilmore Close
- 12 A range and mix of high quality dwellings delivered ranging from one and two bedroom apartments to three and four bedroom houses

Key features:

- 1 Vehicle access from Downview Road
- 2 Semi-detached houses at the entrance of the site which have been designed to appear as one large dwelling with a generous plot. Constructed from flint with brick quoins and other traditional features such as chimney which will emphasise its importance in hierarchy terms with regard to material palette used and as a key focal building as you enter the development.
- 3 Ability to integrate and bring Green Infrastructure into the development
- 4 The opportunity to create small communal vegetable plots, orchard or incidental 'natural play' overlooked by adjacent properties
- 5 Breaks have been created between the built-form to allow views out of the site to the wider countryside. This will also be appreciated from Beech Road where views are possible at present given the clustering of buildings with intervening single storey barns or incidental spaces.
- 6 Windows serving habitable rooms facing onto the central street or open spaces which will create active frontages on side elevations and promote natural surveillance
- 7 Back to back garden relationships with existing development along Beeches Lane
- 8 Formal native hedgerow to support pollinators used to mark boundaries within large rear gardens or along front gardens to increase wildlife opportunities across the site and add seasonal interest
- 9 Possible attenuation pond with willflower mixture in the south-west corner (lowest part of the site) positioned away from mature trees and their associated root protection areas.
- 10 Central intimate lane has been created creating a linear development on the edge of the village
- 11 The placement and orientation of the lane and new buildings follows the existing contours and responds positively to the topography
- 12 The use of car barns and small car parking court retains the openness of the development
- 13 All properties along the eastern boundary, running in a north-south direction are either single storey bungalows or the properties along the southern corner are one and half storeys in height, with dormer windows inserted within the roofscape to keep this as low as possible and varied
- 14 Possible footpath connections to the neighbouring field towards the west in Elm Rise or eastwards to the wider public rights of way network or Stable Lane village
- 15 Density decreases, creating a more appropriate transition from the existing residential area to the wider countryside. The creation of a new enhanced settlement edge would be provided
- 16 New strategic tree planting to soften the views of elevated neighbouring houses to the east along Stable Lane as a wider landscape benefit and ecological enhancement
- 17 Retention and strengthening of mature tree and hedgerow boundaries
- 18 Ability to use the wider field as paddocks (something sought by Neighbourhood Planning Group)

Illustrative Layout Two - Land to the north of the current allocation at Elm Rise



Summary

It is disappointing that the draft Updated Neighbourhood Plan has not chosen to allocate either site at Elm Rise, currently being promoted. Seaward Properties have an established track record of delivery that can be relied upon to bring the site forward within the first five years of the plan period to meet the apportioned housing need without delay. It also has the expertise to deliver a high-quality scheme that is responsive to its context, within the protected landscape.

It is considered a missed opportunity and may prove challenging to demonstrate how the plan in its current form meets the basic conditions of the Regulations. This is largely due to the landscape issues highlighted from proposed new housing allocations and settlement boundary extension to the south of the A24.

In light of the risks highlighted by the SDNPA and legal advice sought, Findon could ultimately end up with additional housing allocations as a result from both emerging plans. Seaward Properties, supported by the attached evidence, maintains the view that Elm Rise is the most sequentially preferable site in landscape terms of all sites available in Findon. The site is immediately available and development can be achieved as demonstrated by all of the supporting evidence prepared to date. The site is not hindered by infrastructure issues or unusual planning constraints, unlike some of the alternative sites.

The submitted concept plans have been informed by public consultation with the Updated Neighbourhood Planning Working Group (UNPWG) and will significantly contribute to meeting the affordable housing need identified by the 2013 Findon Housing Needs Survey (and the 42 households on the Housing Register for Findon) on only a few small sites identified as suitable for development in Findon by the SDNPA SHLAA 2016.

Either concept plan presented has the opportunity to in part, make a significant contribution to meeting the allocation of a minimum of 28 dwellings apportioned to Findon and accord with the direction of travel of the emerging SDNPA Local Plan which proposes to allocate between 14-18 dwellings to the site.

The LVIA and landscape capacity study undertaken by Lizard Landscape Design and Ecology concludes that whilst there are a number of smaller sites within or adjacent to the built fabric of Findon, which have moderate to high landscape capacity for accommodating residential development, the Land East of Elm Rise has both moderate landscape capacity and an opportunity to improve the settlement edge.

The figure ground analysis demonstrates (found within the pre-application supporting statement) that the development will acceptably integrate with the established landscape character of the area whilst the proposed design and layout is locally distinctive.


Safe access and egress can be provided, trees and hedgerows are respected, including those the subject of Tree Preservation Orders, whilst flood risk, archaeology and ecological issues are all addressed positively by the development.

The pre-application document has sought to outline two possible development concepts which is based on contextual evidence and analysis. Further work will be undertaken to help develop the detailed scheme but the design team would very much like to work with the UNPWG and the community on the landscape-led approach, guided by the SDNPA at an early stage.

Yours sincerely



Natalie Fellows BA (Hons) MSc MRTPI
Associate
Email: nataliefellows@lukenbeck.com

From: Natalie Fellows Nataliefellows@lukenbeck.com 
Subject: FW: FINDON UPDATED NEIGHBOURHOOD PLAN JUNE 2018 CONSULTATION - COMMENTS ON BEHALF OF SEAWARD PROPERTIES
Date: 13 August 2018 at 14:46
To: unpwg.findonparishcouncil@gmail.com
Cc: Robin Reay RobinReay@lukenbeck.com

NF

Good afternoon David,

Thank you for confirming that you have received our comments on the above consultation.

My colleague Robin in my absence, also provided a 'we transfer' link of all the accompanying supporting evidence given the file sizes were too large to attach to the email. Please can you confirm you received this link and downloaded all the attachments ok.

Following on from the comments made on the pre-application, I also attach a copy of the email correspondence we have had from Arun District Council regarding the Housing Need in Findon.

We would welcome a further opportunity to discuss emerging proposals at Elm Rise, Findon in due course.

Kind regards,

Natalie Fellows BA (Hons) MSc MRTPI
Associate
Luken Beck
30 Carlton Crescent
Southampton
Hampshire SO15 2EW

Office: +44(0) 2380 633440
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Website: www.lukenbeck.com



From: David Hutchison <unpwg.findonparishcouncil@gmail.com>
Sent: 13 August 2018 13:44
To: Robin Reay <RobinReay@lukenbeck.com>

Subject: Re: FINDON UPDATED NEIGHBOURHOOD PLAN JUNE 2018
CONSULTATION - COMMENTS ON BEHALF OF SEAWARD PROPERTIES

Robin,

Thank you taking the time to submit comments on behalf of your client(s)

The updated neighbourhood plan working group will review all submissions over the next two months before finalising the Reg 15 Submission.

Best wishes.

David

David Hutchison
Acting Lead Updated Findon Neighbourhood Plan Working Group.

On 10 Aug 2018, at 17:00, Robin Reay <RobinReay@lukenbeck.com> wrote:

Dear Sir, Madam,

Please find attached the covering letter for consultation comments on behalf of Seaward Properties in response to the Findon Updated Neighbourhood Plan consultation, submitted ahead of the deadline for comments of 6 pm on the 10th August.

The covering letter is accompanied by a number of supporting documents and plans which will be submitted separately.

Robin Reay MRTPI
Luken Beck MDP Ltd,
30 Carlton Crescent,
Southampton SO15 2EW

Tel: 023 80633440

<image001.gif>

Development " Management " Planning

<Updated Findon Neighbourhood Plan Consultation.pdf>



Mail Attachment

Representations on behalf of:

MR ANDREW FARQUARSON AND MR DEREK STEELE

**In accordance with the Town & Country Planning Act 1990
(as amended):**

DRAFT UPDATED FINDON NEIGHBOURHOOD PLAN 2018-2035:

Published for public consultation lasting until Friday 10 August 2018

Land at Housing Allocations HD10 and HD11



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1. Introduction

Henry Adams act on behalf of Mr Roger Farquarson and Mr Derek Steele who are the landowners of the southern part of the paddocks (HD10) and land formerly private allotments (HD11) respectively. This statement outlines that they support the two draft housing allocations, whilst making reference to specific areas of National Planning Policy Framework. The Updated Find Neighbourhood Plan seeks to identify suitable housing allocations, as the current 'made; Neighbourhood Plan does not include any housing allocations

2. Site Background and Description

The first site, HD10 is currently used as grazing land, outside of any flood zones and is level. To the north of the site Wyevale Garden Centre and access to the allocation is proposed to run to the east of the garden centre. HD11, is vacant and overgrown and was formerly used as a allotment land. Existing and proposed access to the site is via 'the Quadrangle', which is an adopted road.

3. Sustainability

As previously mentioned the sites are to the south east of Findon and adjoins residential development to the south and east. Findon is a large village/town with lots of facilities that can be used by residents. In our opinion, the two sites are sustainable locations with the following in close proximity:

- ▶ Primary School (approx. 800m)
- ▶ Recreation Ground (approx. 700m)
- ▶ Public House (approx. 300m)
- ▶ Golf Academy (approx. 1.2km)
- ▶ Post Office (approx. 900m)

The proposed Masterplan in the updated Neighbourhood Plan shows a new equestrian and pedestrian crossing to the main settlement of Findon from the allocations. This would provide a much improved crossing facility across the A24 into the village. Further enhancing the sustainability and suitability of the site.

4. National Planning Policy Framework

National Planning Policy Framework (July 2018) sets out the Government planning policies for England and how these are applied. The NPPF sets out the requirements for the neighbourhood plan steering groups, that should be adhered to when preparing the plan. The NPPF sets out the following:

Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objectives of sustainable development can be summarised as meeting the needs of the present without comprising the ability of future generations to meet their own needs.

Paragraph 8 of the NPPF states that achieving sustainable development means that the planning system has three overarching objectives, which are independent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovative and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of the present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;
- c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Paragraph 9 of the NPPF states that these objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account to reflect the character, needs and opportunities of each area

Paragraph 10 of the NPPF states that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11)

Paragraph 11 of the NPPF states that plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a) plans should positively seek opportunities to meet the development needs of the area, and be sufficiently flexible to adapt to rapid change;
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting overall scale, type or distribution of development in the plan area; or
 - ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole

Paragraph 15 of the NPPF states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

Paragraph 16 of the NPPF states that plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development
- b) be prepared positively, in a way this aspirational but deliverable;
- c) be shaped early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

Paragraph 18 of the NPPF states that Policies to address non-strategic matters should be included in local plans that contain both strategic and non-strategic policies and/or in local or neighbourhood plans that contain just non-strategic policies

5. Housing Allocations

It should be noted that both housing allocations HD10 and HD11, have been combined and masterplanned to provide housing as one site, HD9. By masterplanning the two sites, it enables the site to be brought forward as one and as such improving connectivity between the two sites and also the main settlement. The text for policy HD9 is as copied below:

'Development proposals for housing site allocations HD10 and HD11 should follow the masterplan (see Map 4) which also includes the paddock areas, garden centre site, restored allotments, new road, footpath and cycleway links connecting HD10, HD11 and the Quadrangle to the southern end of the High Street at the Black Horse.'

Housing Allocation HD10 on the southern part of the land at the Garden Centre is proposed for a development of between 10 and 12 residential dwellings. It would allow for the delivery of a high quality development, which would include sufficient land for landscaping to mitigate the visual impact of the development. I have made comment on each of the specific points of the policy below:

- 1. (a) the landowner supports this policy. This allows for good landscaping and protects the surrounding countryside from viewing the development.
- (b & c) the landowner supports these policies. This allows for strong connectivity links into the village of Findon
- (d) the landowner supports this policy as it allows for upkeep of his retained land
- (e) this can be demonstrated through a planning application
- (f) this will be incorporated into the design of any scheme
- (g) this will be incorporated into the design of any scheme
- 2. the landowner is supportive of this policy. This allows for the regeneration and improvements that are needed for the Garden Centre

3. these policies can be incorporated into the design of any scheme

Housing Allocation HD11 on the former allotments north of the Quadrangle is for a development of between 9 and 10 residential dwellings. Similar to allocation HD10, this is a low density at 18 dwellings/hectare. I have made comment on each of the specific points of the policy below:

1. (a) the landowner supports this policy.
- (b) the landowner supports this policy and any design of landscaping will be incorporated in the final scheme
- (c) the landowner supports this policy as this will create a buffer between existing development and the new build
- (d) the landowner supports this policy but it is our opinion that the access is suitable at the current speed limit. Speed limit restrictions can be incorporated into the design of the scheme dependant on highway advice
- (e & f) the landowner supports this as it improves connectivity with the adjoining allocation and the settlement of Findon
- (g) this can be incorporated into the design of any scheme
- (h) this can be incorporated into the design of any scheme
- (i) this can be incorporated into the design of any scheme
2. the landowners support this policy to provide further facilities to the local population
3. these policies can be incorporated into the design of any scheme

Collectively the two sites can deliver a suitable quantum of housing to assist in meeting the local housing requirement. The masterplan approach is also supported by the landowners. The comprehensive design of the scheme would ensure the sites can, however, provide their own independent points of access, which will be of benefit to the scheme.

6. Conclusion

The landowners are supportive of development on the site and the site is readily available for development. They are supportive of the allocation in the draft plan, which takes a positive approach to the delivery of housing in this area of land. The requirements of Policy HD9 are also supported, as it will allow for a comprehensive design and layout to be achieved, with improved connectivity.

Representations on behalf of:

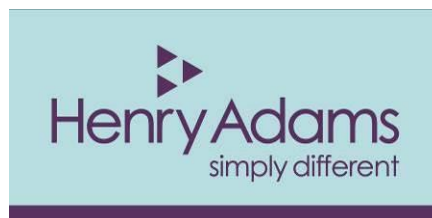
MRS ALTHEA GIFFORD

**In accordance with the Town & Country Planning Act 1990
(as amended):**

DRAFT UPDATED FINDON NEIGHBOURHOOD PLAN 2018-2035:

Published for public consultation lasting until Friday 10 August 2018

**For buildings and associated land at Soldier's Field Stables to be included
within the Settlement Policy Boundary of Findon**



**Henry Adams LLP Rowan House, Baffins Lane, Chichester, West Sussex PO19 1UA
01243 533633 planning@henryadams.co.uk henryadams.co.uk**

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A list of our members and partners is available for inspection at our registered office at Rowan House, Baffins Lane, Chichester PO19 1UA
Regulated by the RICS (Royal Institution of Chartered Surveyors)

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Appendices

Appendix 1 – Location Plan

Appendix 2 – Existing Settlement Policy Boundary

Appendix 3 – Copy of Findon Policy Map from Draft South Downs National Park Local Plan

Appendix 4 – Proposed Settlement Policy Boundary including Soldier’s Field Stables

1. Introduction

Henry Adams act on behalf of Mrs Althea Gifford who is the landowner of the buildings and associated land at the Soldiers Field Stables. This statement outlines that we do not support the Settlement Policy Boundary in its current form, whilst making reference to specific areas of the National Planning Policy Framework. We feel that the Settlement Policy Boundary in its current form fails to meet the criteria set within the policies and is out of date.

The proposed Findon Neighbourhood Plan seeks to extend the Settlement Policy Boundary to include housing allocations. It is our opinion that the revised Settlement Policy Boundary should also include this site as it adjoins the Settlement Policy Boundary, and comprises the previously development brownfield land.

2. Site Background and Description

For reference the site is edged in red in appendix 1 of this submission. The site in question is a former racing stable yard and associated land to the east of Soldier's Field Lane, on the eastern edge of Findon. The site adjoins the Settlement Policy Boundary on its western boundary. The site has an extant planning permission for mixed residential/equestrian use under ref. SSNP/15/01361/FUL and has a current application submitted that is undecided.

3. Sustainability

As previously mentioned the site adjoins the Settlement Policy Boundary on the western edge. Findon is a large village with lots of facilities that can be used by the residents. In our opinion, the site at Soldiers Field Stables should be included within the Settlement Policy Boundary due to its close proximity to the following facilities and therefore in a sustainable location:

- ▶ Primary School (approx. 500m)
- ▶ Recreation Ground (approx. 550m)
- ▶ Public House (approx. 400m)
- ▶ Golf Academy (approx. 800m)
- ▶ Post Office (approx. 500m)

4. National Planning Policy Framework

National Planning Policy Framework (July 2018) sets out the Government planning policies for England and how these are applied. The NPPF sets out the requirements for the neighbourhood plan steering groups, that should be adhered to when preparing the plan. The NPPF sets out the following:

Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objectives of sustainable development can be summarised as meeting the needs of the present without comprising the ability of future generations to meet their own needs.

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Paragraph 18 of the NPPF states that Policies to address non-strategic matters should be included in local plans that contain both strategic and non-strategic policies and/or in local or neighbourhood plans that contain just non-strategic policies

5. Permitted and Proposed Development

As previously mentioned the site has an extant permission under ref. SDNP/15/01361/FUL. This application was for the 'regeneration of dilapidated stable yard and associated buildings comprising holiday cottage and one new dwelling together with replacement dwelling and ancillary stables and storage barn.'

Henry Adams and the applicants concede that the subject site is currently outside the Settlement Policy Boundary. However, when reading the delegated report accompanying the approved application, the case officer notes that 'the site reads as if it were in the Built Up Area Boundary as the road that leads to the site has residential properties off to the south and west of the site'. This is important to consider as including this site will not be an obvious deviation from the existing landscape.

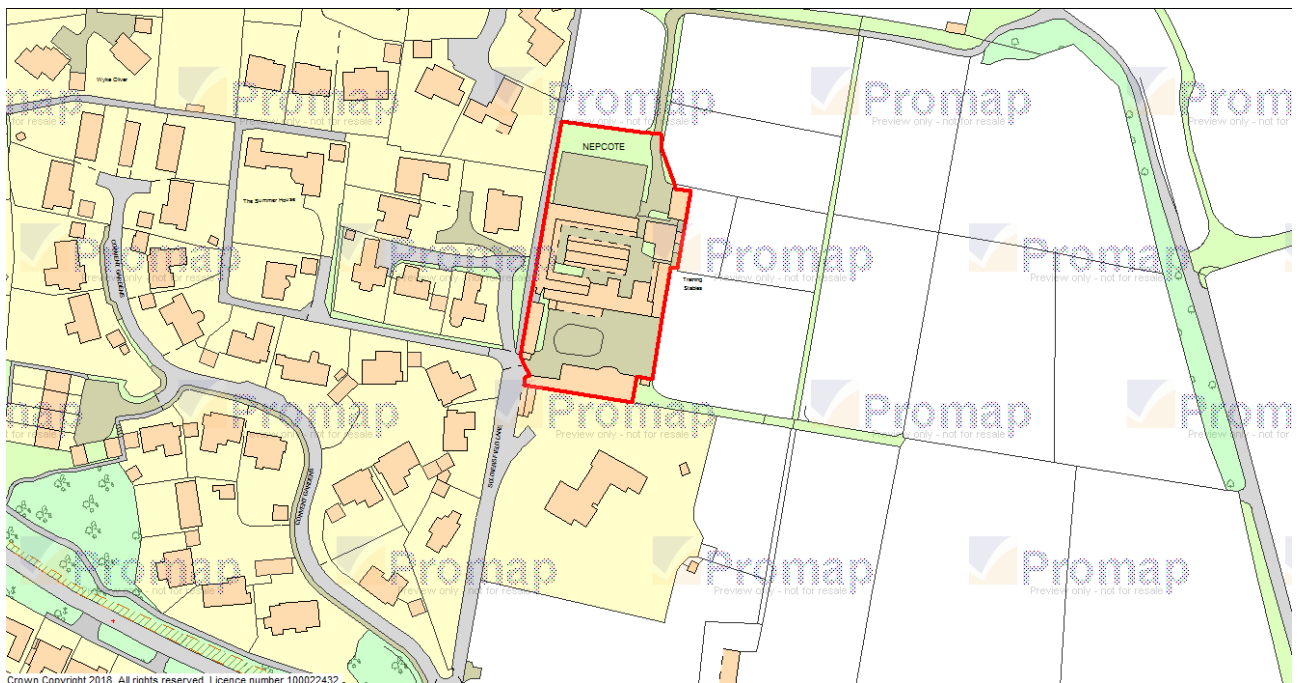
It should also be noted that the Draft South Downs National Park Local Plan is currently being reviewed by an Inspector. The Draft Local Plan concedes that the 'Made' Findon Neighbourhood Plan 2016 does not define a Settlement Policy Boundary, but uses the Arun 2003 Local Plan. With Arun District Council recently adopting their new Local Plan, settlements within the South Downs National Park but within the Arun District, remain governed by the saved policies of the 2003 Arun Local Plan. It is our opinion that the Settlement Policy Boundary from the Arun 2003 Saved Policies is out of date and needs to be reviewed, as sites such as Soldiers Field Stables are now worthy of inclusion.

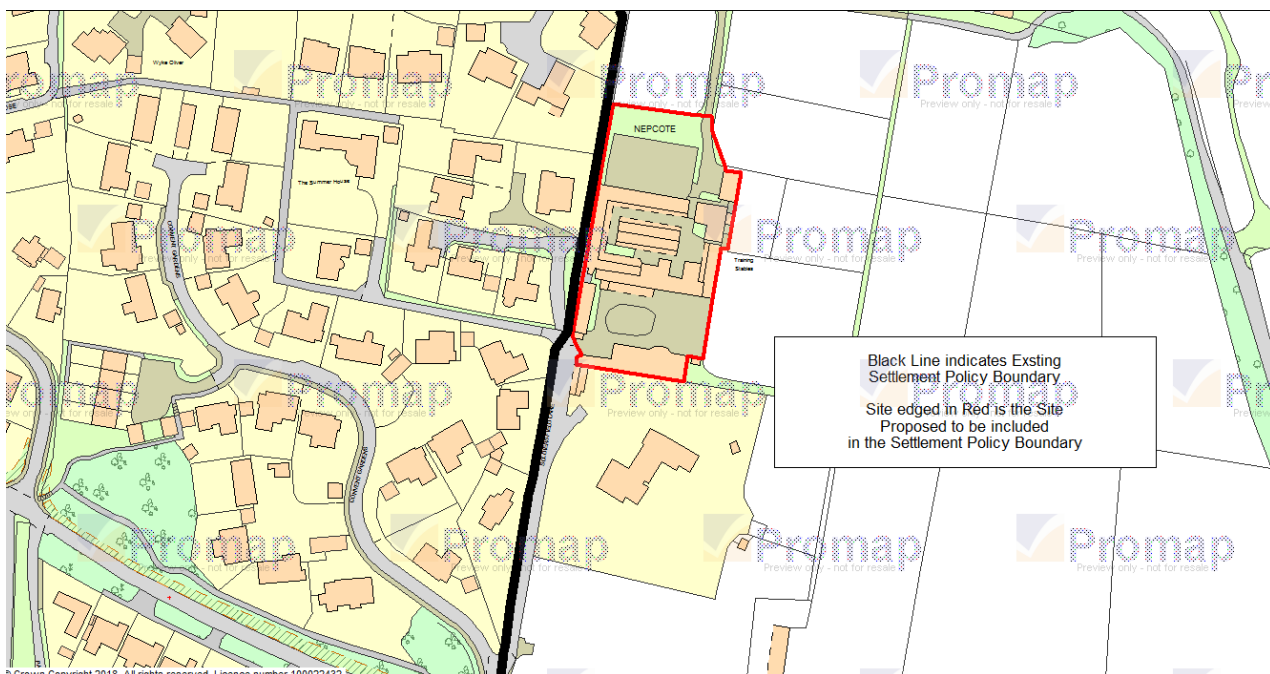
Furthermore, the draft South Downs National Park Local Plan has allocated the land to the immediate south of the subject site for housing, under ref SD72. For reference in appendix 3, I have included the Policies Map from the draft Local Plan, indicating the proposed extension of the Settlement Policy Boundary and the location of the housing allocation. Should the Local Plan be

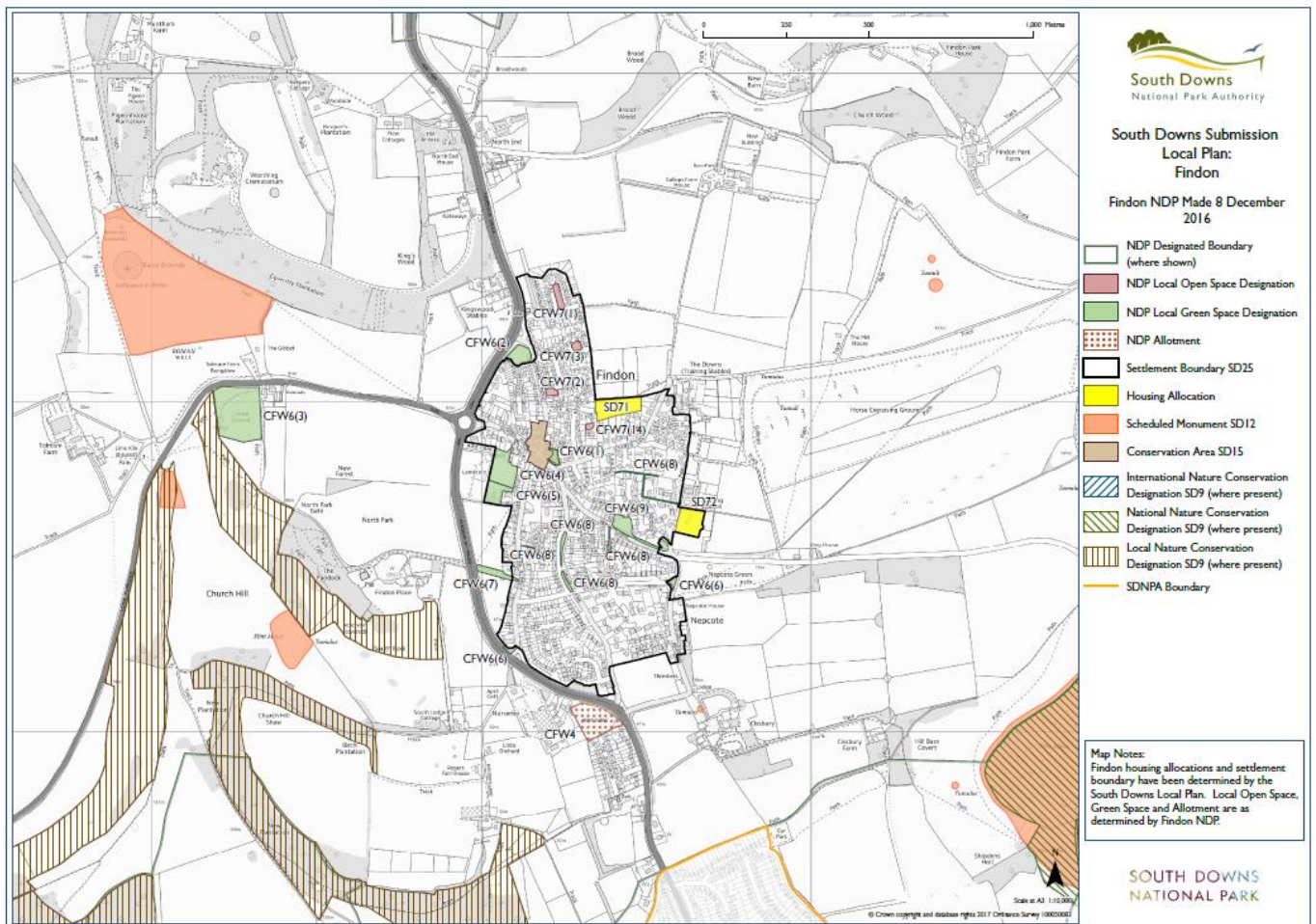
adopted, the Settlement Policy Boundary will be expanded to include this housing allocation. It is therefore logical, due to its location adjoining the allocation and its brownfield use, to include the Soldiers Field Stables in the Settlement Policy Boundary.

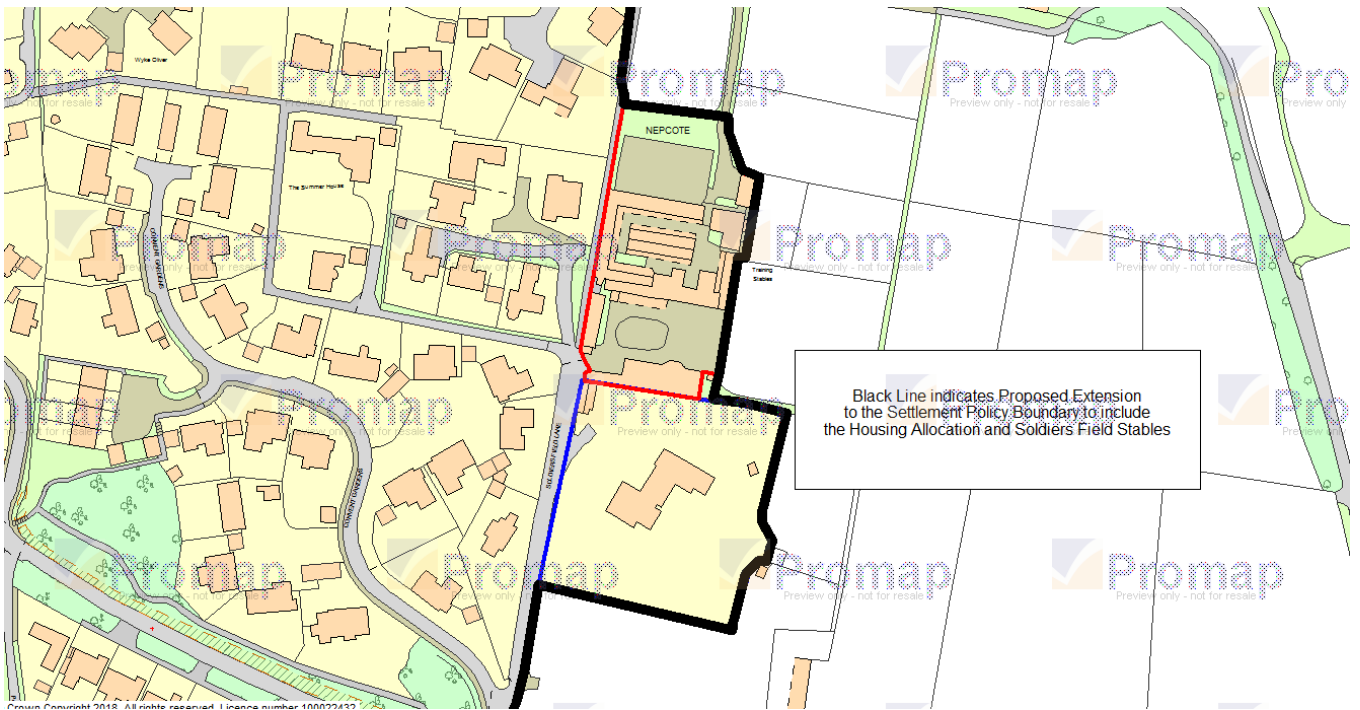
6. Conclusion

It is our opinion that the Settlement Policy Boundary should include the stable buildings and associated land, and not only include Housing Allocations and Local Green Space but brownfield sites adjoining the Settlement Policy Boundary. The site at Soldiers Field stables is a brownfield site, in a sustainable location, with an extant planning permission. As mentioned the planning officer concedes that site appears as if it is already within the Settlement Policy Boundary. Furthermore, with the Draft South Downs National Park Local Plan housing allocation to the immediate south of the site being included within the Settlement Policy Boundary, the site as Soldiers Field Stables is a logical extension.











Findon Parish Council
unpwg.findonparishcouncil@gmail.com
by email only

Our ref: 2018.08.10
Your ref: Findon NP
Pre-
submission
RLS
Comments
Telephone 01483 252028

10th August 2018

To whom it may concern:

Updated Findon Neighbourhood Plan pre-submission version

Thank you for consulting Historic England on the updated Findon Neighbourhood plan. Historic England are the government's advisers on planning for the Historic Environment including the conservation of heritage assets and champion good design in historic places. As such, we have restricted our review of the plan to those areas relevant to our interest only. As the body of the plan remains unchanged we will comment only on those areas that have changed substantially – the site allocations and site assessment process.

Neither of the two sites identified for allocation contains designated heritage assets. Isn't clear whether the historic environment record maintained by West Sussex County Council has been checked to determine whether records of previous archaeological finds in the area would suggest any potential for archaeological remains to be present within the site. This should be explicitly stated as it is a requirement of the National Planning Practice Guidance that "neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions.", The NPPG identifies the Historic Environment Record as an important source of information that should inform the Neighbourhood Plan.

In addition to this consideration we would request that the Neighbourhood Plan Steering Group give consideration to whether the development of these sites and



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



those alternative sites considered and rejected in favour of this allocation) could have impacts on the settings of heritage assets. Conserving those elements of the settings of designated heritage assets that contribute positively to their significance of designated heritage assets should be given great weight in decisions. Sites do not need to be close to heritage assets to affect their settings and may do so through noise and –intrusive night-time lighting or loss of green surroundings as well as through more readily identified visual impacts. We wondered whether potential impacts of other potential site allocations on listed buildings or the Findon Conservation Area and its setting have been clearly taken into account in the reasoning for their rejection.

Whilst the two sites are relatively discretely located in terms of the wider landscape setting we do recommend giving some thought to the design parameters that would be necessary to ensure that development has a high quality in the local context. For example, is it necessary that new buildings should not exceed a number of storeys or a particular height limit or should a particular roof form or building materials be required. The 2018 NPPF places a focus on the use of design codes (so long as these do not stifle appropriate innovation).

Finally, as the neighbourhood plan has included site allocations we feel it is necessary to consider whether it should be subject to Strategic Environmental Assessment (SEA). Neither of the two sites proposed for allocation are considered likely to have significant environmental effects on designated heritage assets. However it is not certain at present, based on the evidence presented, whether there is potential for effects on non-designated heritage assets, which might require SEA. It is also possible that development of some of the sites rejected for allocations (and therefore considered as realistic alternative options) might have resulted in significant environmental effects and that, therefore SEA may be necessary as part of the process of demonstrating that the plan has been prepared in a manner that has sought to minimise such effects. Failure to undertake SEA is a common form of attack on neighbourhood plans by the promoters of sites that have not been accepted and, as such we strongly recommend seeking a screening opinion from the local planning authority. SEA should not be an onerous process and should be focused on those areas where there is potential for significant environmental effects, which should not involve gathering more data than is otherwise required for a properly informed plan making process. The method also provides a robust and transparent record of the decision making process.

We hope these comments are of assistance to the Neighbourhood Plan steering group but would be pleased to answer any queries relating to them.



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Yours faithfully

Robert Lloyd-Sweet

Historic Places Adviser (South East England)
Historic England
Guildford
Tel. 01483 252028
E-mail: Robert.lloydsweet@HistoricEngland.org.uk



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Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



From: Franklin, Richard Richard.Franklin@highwaysengland.co.uk
Subject: RE: #5375 Updated Findon Neighbourhood Development(with housing site allocations)_Reg 14 Version
Date: 3 August 2018 at 11:31
To: unpwg findonparishcouncil unpwg.findonparishcouncil@gmail.com
Cc: Planning SE planningse@highwaysengland.co.uk, Bowie, David David.Bowie@highwaysengland.co.uk, Ginn, Sarah Sarah.Ginn@highwaysengland.co.uk



For the attention of: David Hutchison

Consultation: Updated Findon Neighbourhood Development Plan (2018-2035) Regulation 14 Consultation

Highways England Ref: #5375

Dear Mr Hutchison,

Thank you for your email dated 21 June 2018 inviting Highways England to comment on the above consultation and indicating that a response was required by 10 August 2018.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and, as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs, as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A27.

Having examined the Updated Findon Neighbourhood Development Plan (2018-2035) Regulation 14 Consultation, we note that alternative Housing Site Allocations are proposed to those included in the 2018 South Downs Local Plan, with a resulting increase in housing provision from 28 to between 33 and 38 new dwellings. Highways England is satisfied that this will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 32) and therefore does not offer any objection to the proposed plan at this time.

Thank you again for consulting with Highways England and please continue to consult us via our inbox: planningse@highwaysengland.co.uk.

Regards,

Richard Franklin

Highways England Company Limited | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ | Registered in England and Wales No. 9346363

Web: www.highwaysengland.co.uk

From: unpwg findonparishcouncil [<mailto:unpwg.findonparishcouncil@gmail.com>]

Sent: 21 June 2018 23:15

To: lucy.seymourbowdery@westsussex.gov.uk; communities@westsussex.gov.uk; donna.moles@arun.gov.uk; mark.coates@arun.gov.uk; enquiries@naturalengland.org.uk; planningSSD@environment-agency.gov.uk; southeast@historicengland.org.uk; Cleaver, Elizabeth; contacts.coastal@nhs.net; customerservice@southern-electric.co.uk; customerservice@britishgas.co.uk; planning_policy@southernwater.co.uk; contact.centre@sussex.pnn.police.uk; info@cpre.org.uk; enquires@southdownssociety.org.uk; claphamclerk@gmail.com; patchingpc@gmail.com; admin@angmering-pc.gov.uk; planning_policy@adur-worthing.gov.uk; findonhallbooking@gmail.com; findonparishcouncil@gmail.com

Subject: #5375 Updated Findon Neighbourhood Development(with housing site allocations)_Reg 14 Version

Dear Consultees,

Please find attached the Reg 14 Pre Submission version of the Updated Findon Neighbourhood Development Plan (2018-2035) and an accompanying statement (Flyer_Intro) which gives details of the consultation period and how to submit your comments by 10 August 2018.

The Updated Neighbourhood Development Plan has been prepared to include housing site allocations to meet the housing requirement for Findon which is included in the new SDNPA Local Plan, currently being reviewed by the Planning Inspectorate.

We look forward to receiving comments from you which will inform the Reg 16 version of the Updated NP to be submitted to the SDNPA and an Independent Examiner later this year.

The Reg 14 Updated NP and accompanying statement have also been sent to the SDNPA and local landowners and their agents and is available to view on the Parish Council and Findon Village websites.

Thank you for taking the time to look at our proposals and make your observations.

Best wishes.

David Hutchison B Arch PG Dip TP

Acting Lead, Updated Findon Neighbourhood Development Plan Working Group

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Birmingham B32 1AF | [https://www.gov.uk/government/organisations/highways-](https://www.gov.uk/government/organisations/highways-england)
[england](https://www.gov.uk/government/organisations/highways-england) | info@highwaysengland.co.uk

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Consider the environment. Please don't print this e-mail unless you really need to.

[REDACTED]
The Quadrangle

Findon

W.Sussex.
[REDACTED]

10/8/18

F.A.O. Miss Fiona Macleod
Parish Clerk
Findon Parish Council

Dear Miss Macleod

I write to you re The Pre – Submission 14 document from the UFNDPWG concerning their plans counteracting the previously agreed Plan agreed by the SDNPA, outlining my & many of our other residents concerns in The Quadrangle to the latest suggestions.

- 1) I agree that extra housing has to be found somewhere in the Village to the tune of about 30 new houses.
- 2) I am, though, very concerned that if the land North of the Quadrangle (WSX192860 – Site 16 in the Plan) is allowed to be developed with access granted to it through the existing Quadrangle from the Main A24 road, this will put additional safety constraints into what is already a very dangerous entrance & exit onto a “50mph” highway, at a point where there are dangerous bends in the road & visibility is poor – very often at present there are near misses with the existing volume of traffic. If 10-12 new homes were built with perhaps potentially 20-24 extra vehicles exiting The Quadrangle at this point, it would make it extremely dangerous especially for the traffic wishing to turn south across 2 lanes of traffic.
- 3) The argument put up in The Pre-Submission assumes that Mr. George Lister who owns the plot of land to the west of Site 16 (WSX271114) has agreed that he would sell a part of the southern part of his land to allow access from the existing Wyevale land (WSX366851, WSX157292 & WSX96676 owned by Mr. Andrew Farquarson to allow access into Site 16. However, I understand that up to today (10/8/18) Mr. Lister has stated that he has no intention of selling his land to allow access & development from Mr. Farquarson's land . If that permission was granted & land sold by Mr. Lister, to allow access ,then basically myself & our other neighbours would intrinsically not object to development taking place on Site 16 subject to other concerns which I will state later.

- 4) I understand that , in addition to Mr. Farquarson applying for outline permission to demolish & rebuild a new Garden Centre on his land at the aforementioned WSX366851 & WSX157292 (Site 17A), he is seeking to build up to 40 new homes on existing Paddock Land that he owns – WSX96676 (Site 17). I & our fellow residents would wholeheartedly object to any plan that would involve building on that existing Paddock Land to the west of The Quadrangle on land , which I believe, is outside the Parish Boundary & is again used for equine purposes – a cause which I thought from the Pre-Submission was core to the thinking of retention in the UFNDPWG's Plan ? This is exactly the same argument which they object to in the consideration of building on The Elm Rise Land which has already been agreed in the last Plan by the SDNPA !
- 5) Building on this land would also, would it not, be going against the sacrosanct of protecting “The Findon Gap” ?
- 6) My other concern specific to any building on Site 16 would be concerning any protected wildlife habitats such as the Great Crested Newt & various species of snakes etc. which I understand from neighbours , are present on that land.

I would appreciate your acknowledgement of the receipt of this Letter of Objection to you, and answers back, please, where applicable.

Yours sincerely,

Nicola J. Snowden

1)

Neighbourhood Plan Consultation – Response Template for services

July 2018

Neighbourhood Plan	Findon NDP
Stage of consultation	Regulation 14 Updated Plan
Responses needed by	17th August

Policy reference	CFW3
Page/paragraph reference	
Key Issue	
Outdoor sport and recreation land should not be built on for any purposes other than recreational facilities for the school.	
Concern as written	
The provision of recreational facilities will be supported provided that their design and scale are in keeping with the landscape and local character and that the impact on the amenity of surrounding properties in terms of siting, parking, noise, design and external appearance is acceptable. School playing fields cannot be included or designated as open space, increase in demand for school places may necessitate the expansion of the primary school serving the local community.	
Suggested amendment to resolve concern	
Make amendment to show we would be prepared to support reasonable expansion of the recreational facilities for the schools benefit to meet future needs.	

Policy reference	CFW6
Page/paragraph reference	
Key Issue	

Green Space status could impact on the schools need to expand based on the future needs and demands of the local community

Concern as written

The playing fields are owned by WSCC but the school is not. We would object to the designation of the playing field becoming a designated Green Space under the grounds that the school may require the land to extend if there is a future need for this.

Suggested amendment to resolve concern

Amendment to allow for reasonable expansion of there should there be a future requirement or demand.

Policy/Page reference	CFW and Appendix 1
Policy/page/paragraph reference	
Key Issue	
We do not see a need for a Parish Council to request for a designation of the school and playing fields as a Community Asset. We feel this would make it hard for the school to extend in the future if there were a need to do so.	
Concern as written	
For the same concerns above this clause could impede on the schools ability to provide adequate spaces for the local community in the future.	
Suggested amendment to resolve concern	
The school owned by the diocese and its associated playing fields owned by WSCC should not be included in the Community Asset status, to allow for the opportunity for the school to extend should there be future need for this.	

West Sussex County Council – Representations on the Findon Neighbourhood Development Plan – Pre-Submission Consultation (Regulation 14)

August 2018

Thank you for the opportunity to comment on the Regulation 14 Draft Findon Neighbourhood Plan.

The focus of the County Council's engagement with the development planning process in West Sussex is the new Local Plans that the Districts and Boroughs are preparing as replacements for existing Core Strategies and pre-2004 Local Plans. Whilst welcoming the decisions of so many parishes to prepare Neighbourhood Plans, the County Council does not have sufficient resources available to respond in detail to Neighbourhood Plan consultations unless there are potentially significant impacts on its services that we are not already aware of, or conflicts are identified with its emerging or adopted policies.

In general, the County Council looks for Neighbourhood Plans to be in conformity with the District and Borough Councils' latest draft or adopted development plans. The County Council supports the District and Borough Councils in preparing the evidence base for these plans and aligns its own infrastructure plans with them. The County Council encourages Parish Councils to make use of this information which includes transport studies examining the impacts of proposed development allocations. Where available this information will be published on its website or that of the relevant Local Planning Authority.

In relation to its own statutory functions, the County Council expects all Neighbourhood Plans to take due account of its policy documents and their supporting Sustainability Appraisals, where applicable. These documents include the West Sussex Waste Local Plan, Joint Minerals Local Plan, West Sussex Transport Plan and the West Sussex Lead Local Flood Authority Policy for the Management of Surface Water. It is also recommended that published County Council service plans, for example Planning School Places and West Sussex Rights of Way Improvement Plan, are also taken into account.

Strategic Transport Assessment

The Strategic Transport Assessment of the South Downs Local Plan Preferred Options, tested the cumulative impact of development proposed within the National Park (Scenario 1: Local Plan Preferred Options) and an additional scenario which tested a higher housing number (Scenario 2: Medium Housing Target + 60%). A further assessment has also been made of the impacts of a revised distribution of development in Midhurst and Easebourne. The County Council has worked collaboratively with SDNPA to inform the Strategic Transport Assessment along with the additional assessment and on the basis of continuous review of the work carried out, supports its conclusions.

The purpose of the Strategic Transport Assessment was to undertake an assessment of the transport implications of development proposed by the South Downs Local Plan on the highway network, identify the impacts and appropriate and feasible mitigation. Mitigation measures have then been included in the Infrastructure Delivery Plan that accompanies the South Downs Local Plan. The

Strategic Transport Assessment took account of the sites allocated in the South Downs Local Plan and included a forecast estimate of background traffic growth. In considering the Neighbourhood Plan for Findon, the size and location of proposed site allocations have been taken into account when considering if further transport evidence is required at this stage.

The overall level of development proposed in the Findon Neighbourhood Plan is in accordance with the forecast estimate of background traffic growth assumed in the Strategic Transport Assessment. The Strategic Transport Assessment indicates that there will be no severe impacts on the transport network that cannot be mitigated to a satisfactory level. The County Council considers that this provides sufficient evidence to justify the overall level of development proposed in the Findon Neighbourhood Plan. Therefore, it is not necessary to produce further transport evidence before allocating the sites proposed in the Neighbourhood Plan for Findon.

The Strategic Transport Assessment indicates that over the plan period, traffic conditions in some locations are likely to worsen due to the effects of background traffic growth. If not addressed through improvements to the highway network, this could exacerbate existing congestion issues, or lead to congestion in previously uncongested locations. Therefore, as development takes place there will be a need for improvements and / or financial contributions to be secured towards the delivery of these improvements.

The County Council have no overriding concerns about the transport impacts of the Findon Neighbourhood Plan. However, given that the pre-submission Neighbourhood Plan for Findon includes the proposed allocation of small scale housing sites, it should be noted that site specific matters in the Neighbourhood Plan will need to be tested and refined through the Development Management process (through the provision of pre-application advice or at the planning application stage) or as part of a consultation for a Community Right to Build Order. Whilst the County Council supports the proactive approach undertaken to allocate sites in the Neighbourhood Plan, we are unable to comment on site specific matters at this stage. In considering site specific matters, please refer to the attached Development Management guidance.

The County Council currently operates a scheme of charging for highways and transport pre-application advice to enable this service to be provided to a consistent and high standard. Please find further information on our charging procedure through the following link:

http://www.westsussex.gov.uk/leisure/getting_around_west_sussex/roads_and_pathways/plans_and_projects/development_control_for_roads/pre-application_charging_guide.aspx

Lead Local Flood Authority

The Lead Local Flood Authority (LLFA) has a statutory responsibility for the management of local flood risk, i.e. flooding from surface water, groundwater and ordinary watercourses. However, these risks do not necessarily operate in isolation.

The two proposed housing sites HD10 and HD11 are located either side of the base of the natural valley and therefore a drainage route from the downland. This does not discount their suitability for housing development in as the risk for the most part is low (light blue = 1:1000 year probability of surface water flooding based upon the EA mapping). However, flooding has occurred both upstream and downstream of this location in the valley. The attached map shows both sites sketched on the map with the surface water flood layer overlaid. According to the available mapping, there is a low risk of groundwater flooding.

There is also believed to be a piped drain / culverted watercourse that runs south east from the pond adjacent to the Garden Centre. It is not known where it routes thereafter but we would recommend further investigation is made before any development.

It is suggested that development is avoided on the eastern boundary (darker shade of light blue) for site HD10; the south western corner of HD11 and too close to the western boundary of HD11, to minimise the likelihood of surface water flood risk.

General Policies

Page 22 3.4.5 Roads and traffic – The plan states that, *"Traffic calming measures and parking restrictions need to be considered to bring about a more cohesive system of traffic management ..."* This can only be done through development where any request for infrastructure can be justified to mitigate the specific impact of development or can be funded through the Community Infrastructure Levy. This section goes on to state, *"School Hill has particularly significant safety issues owing to its narrow dimensions, lack of adequate roadside footpaths and the presence of many cars at school drop off and pick up times."* The Parish should ensure that there is evidence in the form of recorded accident records to support this claim.

Policy BT5 Car Parking – Policy BT5 states, *"Proposals which remove existing parking in the vicinity of existing retail and commercial premises will not be supported. Proposals which reduce existing available parking in the Parish will be resisted. Any commercial enterprise applying for permission which would result in a reduction of off street parking will not be supported."* It is acknowledged that it is stated that the above types of application will not be supported by the Parish. However, it should be noted that each application shall be tested against the National Planning Policy Framework (NPPF) and whether the impact is severe as per paragraph 109.

Please refer to the County Council's Guidance on Car Parking in Residential Developments and the Car Parking Demand Calculator for residential units and [Parking standards and transport contributions methodology supplementary planning guidance](#) for nonresidential development, which can both be accessed via the following link:

http://www.westsussex.gov.uk/leisure/getting_around_west_sussex/roads_and_pathways/plans_and_projects/development_control_for_roads/pre-application_charging_guide.aspx

Page 33 5.4 Getting Around – any changes to the posted speed limits would have to accord with the West Sussex County Council speed limit change policy and evidence provided in the form of recorded speed surveys to ensure that existing speeds are at an appropriate level to justify any change. If these changes are to be sought on the back of development, any requests must be justifiable and in accordance with regulation 122 of the Community Infrastructure Levy.

Policy GA1 Sustainable Travel - It would be helpful to extend reference to footpaths to include bridleways and restricted byways, which also exist in the parish as acknowledged elsewhere in the plan.

Policy GA2 Footpath and cycle path network - It is noted GA2.1 continues to refer to promoting maintenance of existing footpaths and bridleways but this is not specifically stated in the policy statement. Similarly the policy could state support for new A24 equestrian crossings.

Policy GA3 Parking and new development – as above any application that results in a loss of parking must be found to have a severe transport impact as per the NPPF to have a supportable reason for refusal. Please refer to the County Council's Guidance on Car Parking in Residential Developments and the Car Parking Demand Calculator for residential units as set out above under policy BT5.

Policy GA3 A24 improvements – Any changes to the posted speed limit on the A24 must be supported by appropriate evidence and be in line with WSCC Speed Limit Change Policy. For clarity, maintenance issues such as maintaining the margins and central reservation are existing and ongoing matters to be addressed by WSCC as Highway Authority rather than being addressed through new development.

Policy GA5 Traffic management - It is unclear as to why this policy includes the proposal to designate several roads in the parish as Quiet Lanes. Any proposal for this legal status would need to be supported by sufficient evidence. It is suggested that this part of the policy is removed; if it is to be retained then it could be stated in a 'community aspirations' section. It is suggested that the focus of policy GA5 is on ensuring safe and suitable road use for non-vehicular traffic.

Policy CFW3 – we request that the wording is amended as set out below to enable building changes or expansion of the school, if it were needed in the future.

"Existing open spaces including school playing fields outdoor sport and recreation land should not be built on. The provision of recreational facilities will

be supported provided that their design and scale are in keeping with the landscape and local character and that the impact on the amenity of surrounding properties in terms of siting, parking, noise, design and external appearance is acceptable. School playing fields cannot be included or designated as open space, increase in demand for school places may necessitate the expansion of the primary school serving the local community."

Policy CFW6 and Appendix 1- comments from County Council as land owner have been provided. As a Voluntary Aided School (Church of England) West Sussex County Council do not own the building, therefore comments should also be sought from the diocese.

Policy CFW8 - The wording "*required to conform to the highest standard of light pollution restrictions at the time*" is a bit open to interpretation and does not cover the requirement if the lighting was on highway and to be adopted by WSCC PFI contract. It is requested that the wording is changed to '*Any new adoptable highway lighting will need to conform to the West Sussex County Council Private Finance Initiative (PFI) street lighting specification*' It is then requested that the link to the street lighting specification is added to supporting text in in CFW8.1 "*The West Sussex County Council PFI street lighting specification is available from <https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/road-agreements/> under 'Lighting of developer promoted highway schemes'*"

It is also requested that additional wording is added to CFW8.1 to identify the WSCC stance on lighting in this parish "*West Sussex County Council also supports the initiative to keep lighting levels to a minimum and would not consider additional lighting that requires to be maintained under the PFI contract on the grounds of the area being in the national park, our support for the dark skies initiative and energy/carbon usage.*"

Allocated Sites Policies

Policy HD9 Masterplan for the south west end of Findon - HD9.6 and Map 4 refer to providing a foot and equestrian crossing of the A24. Together with the suggested road speed limit reduction (see comments on policy GA3), this would provide a valuable local connection for PROW users either side of the A24.

Additionally, the site allocations give opportunity to establish a route for cycling and horse-riding from proximity of The Quadrangle west to the existing bridleway network, so increasing choice and local connectivity.

Policies HD10 & 11 Garden Centre and Quadrangle – Bullet points b and c on page 53 and points d and e on page 57 make reference for the need for the new development to be served by two existing access points onto the A24. These are the garden centre access and via the Quadrangle. Given the proposed number of units consideration should be given as to whether it actually needs to be a requirement that two access points are provided. The wording within the plan could be less prescriptive and further testing done at planning application

stage to see whether two access points are required. As stated within the plan HD11 can come forward independently of HD10 and it may be that just access via The Quadrangle is provided; for example. If there is an intensification on an access or modifications to the highway, a Stage 1 Road Safety Audit should be undertaken at planning application stage.

Policy HD12 Nightingales – In relation to page 60 bullet point c and d it should be noted that the applicant of any future development has to address and mitigate the impact of their own development. It should not be a requirement of the development to address existing issues. The development should only be required to provide replacement car parking spaces if the car parking spaces are lost as a direct result of the development or parking restrictions are required to enable access to the development. At application stage a Stage 1 Road Safety Audit should be provided to assess the road safety implications of any new access.

In the event this site is developed, there is opportunity to enhance the local bridleway network for the benefit of walkers, cyclists and horse riders. Creating a bridleway from Nightingales north to Findon Park Road would not only improve connectivity for North End residents but there would be a local circular route for the development.

Development Management Guidance

There are two sets of guidance that govern road design: Manual for Streets (MFS) for lightly trafficked residential streets and Design Manual for Roads and Bridges (DMRB) for all other roads, including rural roads. These can be accessed through the following link under 'resources':

http://www.westsussex.gov.uk/leisure/getting_around_west_sussex/roads_and_pathways/plans_and_projects/development_control_for_roads/pre-application_charging_guide.aspx

The County Council supports the approach set out in MFS, which has been adopted guidance for residential street design since its introduction in 2007. Within this document there are some very useful references to visibility splays, turning circles and car parking layouts. The document does not however provide specific measurements for visibility splays, so:

"X "Distances from the (kerb back) are typically:

- 2.0 metres -domestic single accesses
- 2.4 metres- for shared or busy crossovers
- 4.5 metres- for busy junctions
- 9.0 metres-major junctions

"Y "Distances are based on vehicle speed, and for lightly trafficked residential streets MFS would be applied:

- 20 mph- 25 metres
- 25 mph- 33 metres
- 30 mph- 43 metres

For a road where the 85th percentile speed is in excess of 37 mph and for roads where MFS does not apply, TD/93 distances from DMRB would be applied:

- 40 mph-120 metres
- 50 mph-160 metres
- 60 mph-215 metres

The Local Design Guide provides further advice on how MFS is to be interpreted and applied within West Sussex. It can also be accessed via the link above under 'resources'.

The WSCC parking standards were adopted in 2003 as Supplementary Planning Guidance (SPG). The SPG sets out parking standards for development in West Sussex. However, in September 2010 a new approach to parking in residential developments was adopted and changes to the original SPG that are affected by the September 2010 changes have been highlighted in the 'Guidance on Car Parking in Residential Development'

document provided in the link above. This also contains recommended levels of cycle provision.

Figure 1: Lead Local Flood Authority sketch of Sites HD10 and HD11 with surface water flood layer superimposed.

