

ON THE MATTER OF THE ROBUSTNESS OF THE LCAs FOR ALLOCATION SITES SD71 AND SD72 IN THE 2018 SUBMISSION LOCAL PLAN AND THE ROBUSTNESS OF THE ASSESSMENTS OF ALTERNATIVE SITES AS ALLOCATION OPTIONS

1. REVIEW OF SD71 LANDSCAPE CHARACTER ASSESSMENT
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A clarification to a representation made by FPC//UFNPWG on the inclusion of housing site allocations SD72 in the SDNPA 2017 Pre Submission Local Plan

30 August 2018

1. REVIEW OF SD71 AND SD72 LANDSCAPE CHARACTER ASSESSMENTS

SD71 Land East of Elm Rise

- 1.1 The SDNPA LCAs for Findon identify the site, like all outside edge of settlement sites around Findon, as being within the '*SDILCA Character Area A3: Arun to Adur Open Downs.*'
- 1.2 The '*Historic Landscape Character*' of allocation site SD71 is described as '*Fieldscapes: Early 20th century (AD 1914-AD 1945)* while the '*Views and Visibility*' description is, '*The site is widely visible from a number of locations to the immediate south, east and west of the site where it abuts the settlement edge. The boundary to the east is probably the most sensitive where the site is viewed from bridleways which provide access onto the wider downs and the site is viewed as part of the undeveloped valley sides. From the opposite valley side to the west the site is visible an open field at the current settlement edge.*'
- 1.3 The '*Landscape Framework*' description is '*The site is a field laid to pasture with some subdivision.....Located on the eastern Findon valley side and is the most southerly extent of the open undeveloped valley side.*'
- 1.4 The '*Contribution to key SDNPA landscape features and/or Special Qualities*' description is '*The site forms the southern most extent a sweep of open countryside which extends into Findon along the valley side.*'
- 1.5 The above landscape criteria and their weighting have led to an overall '*Landscape Sensitivity*' assessment for allocation site SD71 of '**Medium sensitivity** in the western section. **Medium high sensitivity** to the east as the site becomes more elevated and views from the bridleway would be affected.'
- 1.6 The site was pro actively brought forward by a house builder and their consultants, on behalf of the land owner, with detailed housing layout plans showing access from Elm Rise at the location of the existing field gate. The site was therefore taken to be available and capable of delivering an emerging, policy compliant number of affordable homes in addition to larger market houses.

- 1.7 On the basis of a landscape sensitivity of '**medium**'; for the lower part (25% of the site) and '**medium high**' for the more elevated part (75% of the site, in high visibility terms), the availability and deliverability, the site was allocated for a development of between 14 and 18 houses, in the 2018 Submission Local Plan.

Is the LCA robust ?

- 1.8 There are two issues here; are there any divergencies between the analysis of the criteria used to derive the landscape sensitivity and the sensitivity rating itself; and have the SDNPA methodologies for preparing the landscape character assessments and arriving at the capacity of the site to absorb housing development without significant harm to the landscape, been followed robustly, in particular the recognition given to, and assessment of, local landscape character and features, local cultural heritage, and local historic environment.
- 1.9 The '*Historic Landscape Character*' rightly refers to the Sussex HLC, however that defines broad areas across the county and its districts and doesn't identify well discreet smaller landscape areas within, or immediately around individual settlements that may have a predominantly local historic landscape character. Allocation site SD71 can clearly be identified as part of Findon Farmhouse farm on the 1838 Findon Tithe Map and entitlements and on Ordnance Survey maps up to 1949. Following its sale in 1946, the lower sides of the dry valley were gradually developed with housing while the more extensive areas of the higher sides of the valley which merge into open downland have remained as field pasture/grazing paddocks. A more local definition of the 'Historic Landscape Character would be '*Fieldsapes: (Early 19th century)*'
- 1.10 '*Views and Visibility*' does not give any significant recognition to the nature and importance of views of the site from the opposite side of the valley which are equally, if not more sensitive than the more immediate closer view from the east, on the site side of the valley. The views from the opposite side of the valley show the site to be widely visible from the PROW at Long Furlong, the PROW from the Church past the former Glebeland towards Tolmare; a historic rural road; and the PROW and footpaths on the upper slopes of Church Hill. (Ref Findon Local Viewshed library)

- 1.11 The simple description in *'Views and Visibility'* that *'from the opposite side of the valley the site is visible as an open field at the current edge of the settlement'* should be more properly described as *'.....visible as...'* part of an extensive network of paddocks, open fields and open downland at the historic meandering edge of the settlement.
- 1.12 The *'Landscape Framework'* description *'The site is a field laid to pasture with some sub division'* would be more accurate if described as *'a grazing field laid to pasture which is part of a network of grazing fields that support equine businesses in the settlement'*
- 1.13 Turning to the methodology and the inclusion of local landscape character, local landscape features, local cultural heritage and local historic environment. The allocation site published LCA doesn't include a *'landscape value'* assessment as such and appears to merge a *'landscape value'* assessment into the *'landscape sensitivity'* assessment or conclusion. This is acceptable however and can be considered proportionate to the nature and primary purpose of the LCA, unless there are significant omissions in the criteria used or there would be a significant impact on the end assessment or conclusion when local *'character'* in all its landscape forms, is brought into the assessment.
- 1.14 Local *'character'* in its landscape forms, would typically be assessed under SQ6 and SQ7 in Key Characteristics and Special Qualities of the National Park_South Downs Integrated Landscape Character Assessment 2011. However SQ6 and SQ7 criteria do not appear to have been referred to, or been assessed in the published LCA for allocation site SD71, or for that matter, any of the LCAs for outside edge of settlement sites in Findon.
- 1.15 As mentioned in 1.9, allocation site SD71 has significant local historic landscape value to Findon being the only remaining part of the early 19C Findon Farmhouse land that stretched from the original Findon Farmhouse, a listed building still found in the historic village centre, up to the top of Stable Lane. On its own this remaining field pasture close to the historic village centre would perhaps not be given over much weight bearing in mind the extent of housing development that has emerged during the latter half of the 20C. However the listed Findon Farmhouse which dates back to

1825, part of which is now the community store; the farm and community pond has which have been retained as the 'dry' Pond Green with its low flint wall at the lower part of Stable Lane at its junction with Nepcote Lane; both historic rural roads; are all located in the historic village centre Conservation Area. Allocation site SD71 is only a short stroll beyond the Conservation Area, its field gate clearly seen, often with horses around the gate, from Horsham Road.

1.16 Taken together, Findon Farmhouse, Pond Green, Stable Lane and the remaining part of the farm pasture provide a readable reminder of historic 19C Findon and its close connection with the landscape. The FPC TEP Working Group have a current funding bid to the SDNPA IDP for enhancements to the historic Conservation Area. The bid seeks to provide visitor attraction facilities, information and signage for Findon's 19C cultural heritage assets which include Findon Farmhouse, Pond Green Stable Lane, the stroll to the grazing fields and Downs Stables.

1.17 This would give 'historic environment' a high value in local a landscape character assessment for allocation site SD71.

1.18 Cultural heritage can be defined as an expression of the ways of living developed by a community and passed on from generation to generation, including customs, practices, places, objects artistic expressions and values. Tangible expressions are distinguished by the built environment, artefacts, activities and the natural environment. In Findon's case, the connection between the rural landscape and the training and breeding of horses and ponies over the last 200 years, and the grazing of sheep on open downland define its cultural heritage. Although the grazing of sheep on open downland is no longer a rural activity, it nevertheless continues in the folk memory each year in early September at the historic Findon Sheep Fair held at Nepcote Green. This is returned to in the next section of this submission on the robustness of the LCA for allocation site SD72.

1.19 Training and breeding of horses and ponies still thrives today and although race horse training has declined in the second half of the 20C, from five active stables in Findon to the current three, breeding and bringing on horses and ponies, eventing and point to point training, and livery continue to survive as vital equine businesses which show the community and generational continuity which define cultural heritage.

- 1.20 One such local equine business based in Stable Lane has looked after and maintained, under lease, allocation site SD71 as grazing fields for some of their horses and ponies, for more than 25 years. Local demand for grazing fields, in and around Findon, is consistently higher than available fields. The established use of allocation site SD71 and the extensive adjoining network of grazing fields in connection with working equine activities would give 'cultural heritage' a high value in a local landscape character assessment for allocation site SD71.
- 1.21 Pulling together the material omissions in the LCA and including the high landscape value of local 'Historic Environment' and local 'Cultural Heritage' would move the concluding landscape sensitivity assessment to '**high**' with the inverse effect of moving the 'capacity' assessment of the landscape to absorb development of 14 - 18 houses, without significant harm, to '**low**'.

SD72 Soldiers Field House

- 2.1 The SDNPA LCAs for Findon identifies the site, like all outside edge of settlement sites around Findon, as being within the '*SDILCA Character Area A3: Arun to Adur Open Downs.*'
- 2.2 The '*Historic Landscape Character*' of allocation site SD72 is defined in the Sussex HLC as '*Late 20th century settlement expansion, large farmstead dated AD1945-present*'. '*Views and Visibility*' describes the site as '*visible from the adjacent PROW as a large dwelling. it is also visible from the PROW to the east and Nephcote Green to the south.*'
- 2.3 The '*Landscape Framework*' is describes the site as '*part of a large farm complex of existing equine based facilities and buildings.*'
- 2.4 The '*Contribution to key SDNPA landscape features and/or Special Qualities*' is describes the site as '*visible from Nephcote Green*'
- 2.5 The above landscape criteria and their weighting have been trumped by the '*PDL status*' when arriving at a '*Landscape Sensitivity*' assessment for allocation site SD71 of '**Medium sensitivity** due to the PDL status' while noting '*Views to the west are sensitive*

from the wider downland and impact on the adjacent PROW'.....along with ... 'impacts on the setting of Nepcote Green.'

- 2.6 The site was pro actively brought forward by the developer/owner and their consultants, with outline layout plans showing 9 -11 houses, the surrounding beech hedge retained and using the existing, part owned private access lane from Nepcote Lane. The site was therefore taken to be available and capable of delivering some shared ownership affordable homes with more very large detached larger market houses.
- 2.7 On the basis of a landscape sensitivity of '**medium**', '*due to its PDL status*', the availability and deliverability, the site was allocated for a development of between 10 and 12 houses, in the Submission Local Plan.

Is the LCA robust ?

- 2.8 There are two issues here; are there any divergences between the analysis of the criteria used to derive the landscape sensitivity and the sensitivity rating itself; and have the SDNPA methodologies for preparing the landscape character assessments and arriving at the capacity of the site to absorb housing development without significant harm to the landscape, been followed robustly, in particular the recognition given to, and assessment of local landscape character and features, local cultural heritage, and local historic environment.
- 2.9 The '*Historic Landscape Character*' rightly refers to the Sussex HLC, however that defines broad areas across the county and its districts and doesn't identify well any discreet smaller landscape areas within, or immediately around individual settlements that may have a predominantly local historic landscape character. Allocation site SD72 was by the early 19C field pasture belonging to Findon Farmhouse farm which included the adjoining fields to the north and east and was sold in 1946. The land was acquired by Ryan Price to set up a new training establishment after he had decided to move from the older Downs Stables at the top of Stable Lane. The most northern part of the land and the parts to the east were retained as grazing fields, while a new stable complex and trainers house were constructed on the western parts of the land adjoining the PROW. The stable complex was later acquired by the Downs Stables and the trainers house was sold. A local definition of the '*Historic Landscape Character* should be '*Mid*

20th century expansion of racehorse training facilities, large stable complex and trainers house, dated AD1945-present'.

- 2.10 *'Views and Visibility'* does not give any recognition to the more distant views of the site which can be clearly seen from the upper and lower slopes of Cissbury Hill, a major viewpoint identified in the SDNPA Viewshed. Although it is noted *'the site is visible from Nepcote Green'*, the significant value of Nepcote Green to local historic environment and local cultural heritage is not identified, nor that Nepcote Green is the setting of the listed Wattle House, nor that the historic downland training gallops, associated with the earlier use of the allocation site, are also visible in the panoramic views from Nepcote Green that take in the allocation site itself.
(see Findon Local Viewshed library)
- 2.11 *'Views and Visibility'* should identify the special value or significance of particular views of the site.
- 2.12 The *'Landscape Framework'* on the other hand, does identify that the allocation site as *'part of a large [farm] complex of equine based facilities and buildings'* that stretch up the entire eastern edge of Findon to the Downs Stables at the top of Stable lane, The *'farm'* reference however is misleading, there have not been farm buildings on the eastern edge of Findon. If the reference is to Pony Farm, between Soldiers Field and the Downs Stables, that was formerly an arabian horse and pony breeding establishment dating from the early 19C to the mid 20C.
- 2.13 The assertion in the landscape sensitivity assessment that the planning status as PDL is the major determinant in arriving at the *'medium'* rating is misleading. The allocation site includes a large house within very large landscaped grounds surrounded by a beech hedge. There is an argument that only the built on part of the site, is PDL while the SDNPA themselves state in their methodology that a brown field site (PDL) outside a settlement boundary must be assessed for landscape sensitivity and not be assumed to be cable of absorbing development without significant landscape harm on the basis of PDL status.
- 2.14 Turning to the LCA methodology and the weighting of local landscape character, local

landscape features, local cultural heritage and local historic environment when arriving at a landscape sensitivity rating. The allocation site published LCA doesn't include a 'landscape value' assessment as such and appears to merge a 'landscape value' assessment into the 'landscape sensitivity' assessment or conclusion. This is acceptable however and can be considered proportionate to the nature and primary purpose of the LCA, unless there are significant omissions in the criteria used or there would be a significant impact on the end assessment or conclusion when local 'character' in all its landscape forms, is brought into the assessment.

- 2.15 Local 'character' in its landscape forms, would typically be assessed under SQ6 and SQ7 under Key Characteristics and Special Qualities of the National Park_South Downs Integrated Landscape Character Assessment 2011. However SQ6 and SQ7 criteria do not appear to have been referred to, or been assessed in the published LCA for allocation site SD72, or for that matter, any of the LCAs for outside edge of settlement sites in Findon.
- 2.16 As mentioned in 1.9 allocation site SD72 also has significant environment value and cultural heritage value to Findon. Its historic environment value derives from a) when it was developed by Ryan Price, a nationally recognised national hunt racehorse champion trainer who, as Soldiers Field Stables and house, having previously and successfully trained at the Downs Stables at the top of Stable Lane on the same eastern edge of Findon, and b) it being part of the setting of the listed Wattle House and the historic Nepcote Green, part of the original open downland 'sheep walk' that came right into Nepcote and still the venue for the historic annual 'Sheep Fair' which it has done for three hundred years. The Sheep Fair is one of the major countryside events held in the National Park, organised by the FPC these days and attracting around 7000 visitors over the weekend.
- 2.17. The FPC TEP Working Group also have a current funding bid in to SDNPA IDP, to promote visitor awareness of the racehorse training history of Findon which includes visitor attraction information and signage around a 'racing' trail from Nepcote Green, up the PROW past Soldiers Field House and Stables to the Downs Stables, along the open downland training gallops and back to Nepcote Green, via one of the bridleways on this equine eastern edge of Findon. This heritage trail would also be a featured of the proposed Nepcote Green Conservation Area.

- 2.18 These historic equine training and sheep tending activities are mirrored in the landscape and its relationship with its people around the eastern and northern edges of Findon and would give 'historic environment' a high value in a local landscape character assessment for allocation site SD72.
- 2.19 Cultural heritage can be defined as an expression of the ways of living developed by a community and passed on from generation to generation, including customs, practices, places, objects artistic expressions and values. Tangible expressions are distinguished by the built environment, artefacts, activities and the natural environment. In Findon's case, the connection between the rural landscape and the training and breeding of horses and ponies over the last 200 years, and the grazing of sheep on open downland define its cultural heritage. Although the grazing and shepherding of sheep on open downland 'sheep walk' is no longer a significant rural activity, it nevertheless lives on in the folk memory each year through the historic Findon Sheep Fair held at Nephote Green.
- 2.20 Training and breeding of horses and ponies still thrives today and although race horse training has declined since the second half of the 20C, from five active stables in Findon to the current three, breeding and bringing on horses and ponies, eventing and point to point training, and livery continue to survive as vital equine businesses which bring the community and generational continuity necessary to demonstrate cultural heritage.
- 2.21 With the keeping and training of 'eventing' horses at Soldiers Field Stables still active and consent granted for plans for the regeneration of the stables, the redevelopment of the adjoining Soldiers Field House, allocation site SD72, with 10-12 new houses, would permanently sever its historic connection with equine training facilities along this eastern edge of Findon from Nephote Green to Downs Stables at the top of Stable Lane. The location and relatively recent connection of Soldiers Field House with Findon's race horse training heritage would give 'cultural heritage' a high value in a landscape character assessment for allocation site SD72.
- 2.22 Pulling together the material omissions in the LCA and including the high landscape value of local 'Historic Environment' and local 'Cultural Heritage' would move the

concluding landscape sensitivity assessment to **'high'** with the inverse effect of moving the assessment of the capacity to absorb development of 10 - 12 houses, without significant harm to the landscape, to **'low'**.

Are the LCAs for alternative allocation sites robust ?

- 3.1 Prior to bringing forward the two allocation sites in the 2017 Pre Submission Local Plan the SDNPA undertook LCAs on several other sites both on the outside edge of the settlement boundary and within the settlement boundary. These sites included two of four different (alternative) sites which have been included in the 2018 Pre Submission Updated Neighbourhood Plan, both on the other side of the A24 at the south west end of the settlement.
- 3.2 Three of the sites within the settlement boundary were rated as **'Medium Sensitivity'** but they are all sites with good quality houses in mature gardens and the owners confirmed that they were not available for some small scale housing and in any case would not generally be considered as allocation sites as their capacity for net additional houses would be four or less. The fourth site within the settlement boundary was the former rectory house and grounds, listed, now the Findon Manor Hotel with plans to build further bedrooms in an extension and therefore would also not be available for small scale housing.
- 3.3 Of the seven sites outside the boundary, three were rated as **'High Sensitivity'** and were rejected. The four other sites were rated as **'Medium High Sensitivity'**, the same landscape sensitivity rating as the major part of allocation site SD71, and although available and deliverable were rejected. Only one of the owners and their consultants of these sites had submitted illustrative housing layout plans to the SDNPA, like the owners and consultants of allocation sites SD71 and SD72 had done.
- 3.4 The two sites on the other side of the A24 at the south west end of the village, both with existing accesses leading direct to the A24, that are proposed housing site allocations in the 2018 Pre Submission Updated Neighbourhood Plan, were rejected by the SDNPA on the basis of landscape sensitivity ratings of **'Medium High Sensitivity'**. The reason for the rating however does not appear to derive from the assessed landscape criteria, being instead *'due to the poor relationship with the*

settlement pattern' and *'The site(s) also contribute to the Local Gap'*.

- 3.5 However the south west end of the village is still part of the settlement that only became somewhat disconnected from the main part of the village when the A24 'by pass' was built. The 2018 Pre Submission Updated Neighbourhood Plan has included a mini masterplan for the south west end of the Findon which includes proposals to re establish and enhance the connectivity with the main part of the village in association with the two proposed housing site allocations.
- 3.6 The Local Gap was defined in earlier Arun DC Local Plans, 2003 being the last one, but is now due a review. The 2018 Submission Local Plan does not include a local gap policy, but Strategic Policy SD4: Landscape does seek to maintain gaps between settlements. The Findon Local Gap seeks to protect the green gap between the settlement and Findon Valley, to the south, a suburban area north of Worthing and outside the National Park. The two proposed housing allocation sites at the south west end of the village do not incur into the green gap between the village and Findon Valley and are only described as contributing to the Local Gap in the LCAs because the Arun 2003 Local Plan included all of the south west end of the village, including existing housing and the garden centre, on the other side of the A24, in a broad brush local gap.
- 3.7 It will of course rightly be for the Examiner of the Updated Neighbourhood Plan to determine if the basic conditions are met with the inclusion of the proposed different allocation sites, but the underlying point is whether the LCAs undertaken by the SDNPA for the two sites on the other side of the A24, the other assessed sites and the omission altogether of two sites, can be considered sufficiently robust.
- 3.8 Unlike allocation sites SD71 and SD72, the two sites on the other side of the A24 do not have any local 'historic environment' value or local 'cultural heritage' value to assess and with no actual contribution made to the local gap, and with enhanced connectivity to the main part of the village through the masterplan, the landscape sensitivity conclusion would move to *'medium'*. The sites after all are hardly visible, located at the valley bottom of the main part of settlement with good public transport connections, good access to the A24, and not highly visible in the downland on the upper slopes of Findon, like allocation sites SD71 and SD72.

3.9 It should be noted here that the SDNPA Local Plan team themselves suggested the sites on the other side of A24 as a potential location for up to 50 new houses at the early stages of preparation of the made Neighbourhood Plan. The FPC felt that the possible loss of employment on the garden centre part of the site and the number of houses suggested at that time would not be compatible with the aspirations of the emerging Neighbourhood Plan.

SUMMARY AND CONCLUSION

4.1 The LCAs that informed the selection of allocation sites SD71 and SD72 have significant omissions in the landscape criteria used to derive the landscape sensitivity rating and did not give any recognition to, or value to, significant local 'historic environment' value or local 'cultural heritage' value. The consequence is that the landscape sensitivity and the capacity to absorb housing development without significant harm to the landscape are not sufficiently robust and the SDNPAs published methodology for undertaking LCAs, and the subsequent allocation of housing sites has not been properly followed.

4.2 The LCAs that informed the rejection of alternative allocation sites have significant misinterpretations in the landscape criteria used to derive the landscape sensitivity ratings, and in the case of the sites on the other side of the A24 used '*lack of connectivity*' and '*contribution to local gap*' without any supporting evidence, to inform the landscape sensitivity rating. The consequence is that the landscape sensitivity and the capacity of housing development to cause harm to the landscape are not sufficiently robust for the alternative sites on the other side of the A24 and the SDNPAs published methodology for undertaking LCAs, and the subsequent rejection of housing allocation sites has not been properly followed.

4.3 Further, two alternative sites in the main part of the village, one within the settlement boundary, do not appear to have been properly assessed or assessed at all, at least in published documents; the former fire station site and the land adjoining Nightingales to the north.

4.4 In conclusion, there are different housing allocation sites in Findon, that are less landscape sensitive, that are available, equally deliverable, and have demonstrable high levels of local support. Those different sites have been identified, assessed, consulted on with the local community and brought forward in the 2018 Pre Submission Neighbourhood Plan. The NPPF presumption in favour of sustainable development and the National Park duty to foster the economic and social well being of its communities will therefore not be compromised in Findon if allocation policies SD71 and SD72 are found to be unsound because the application of the methodology for undertaking LCAs on the allocation sites and different alternative sites was not robustly followed.