

APPENDIX 4: Schedule of issues relating to the Fernhurst Neighbourhood Plan submission

The comments have been agreed by the Chair of the SDNPA Planning Committee following Members’ discussion of the neighbourhood plan at the Planning Committee on 12 June 2014. The table briefly sets out the remaining areas of concern to the Authority. Comments relating to individual site allocations are set out in Appendix 5.

Application of National Park Duty	The introduction is somewhat selective in its reference to the Duty. Its application needs to be clarified. It is agreed that the Defra Vision and Circular for English National Parks makes reference to the importance of delivering affordable housing (in para. 78 and 79). However, the Circular makes it clear that authorities should give priority to the purposes and that social and economic matters are secondary, for instance: “Authorities should continue to focus their expenditure on the delivery of the statutory purposes, whilst seeking to maximise the socio-economic benefits” (para. 66).
Partnership Management Plan	Factual update (para. 1.13 and 1.15): the Partnership Management Plan has been adopted by SDNPA.
Para. 1.23	Typographical error – the comments made on the draft Plan and how they were taken into account is set out in the Parish Council’s Consultation Statement, submitted alongside the Neighbourhood Plan. The final sentence of the paragraph is incomplete.
Para. 4.20 and para 4.48	It is accepted there may be a need for some intermediate housing but the high house prices in Fernhurst suggest this may still be an unaffordable option for many. No Housing Needs Survey has been undertaken to establish what might be a realistic level of supply for this tenure. This is important in the context of a FNP policy which seeks a slightly higher proportion of intermediate housing than that identified in the Strategic Housing Market Assessment. The Housing Authority (Chichester District Council) has made a separate representation on the Neighbourhood Plan.
Para. 4.29 and Policy HI	<p>The policy seeks to manage the pace at which development is delivered and give particular priority to sites allocated in the neighbourhood plan. However, the policy should acknowledge that rural exception sites could potentially still play a legitimate part of housing delivery, in addition to site allocations and infill developments. Paragraph 54 of the NPPF recognises that rural exception sites can help address local housing need in response to changing local circumstances. Outside settlement policy areas, the Chichester District Local Plan (Policy H9) states that residential development will only be permitted if it provides affordable housing and meets various other criteria, including that the site is modest in scale and relates well, in terms of location and size, to the existing settlement. While there is a degree of conflict between the saved policy and the NPPF, it is only in relation to whether or not to allow market housing in support of rural exception proposals. The broad thrust of the approach remains valid.</p> <p>It must be questioned whether all of the housing allocations would be/could be made sustainable locations for development. The removal of the Hurstfold allocation is sought. If this site cannot come forward for development, then there would be pressure on the Syngenta and Bridgelands allocations to meet the remaining housing need. Any proposal for Syngenta</p>

	<p>which accords with the FNP policy would need to demonstrate the requirements of para. 116 of the NPPF have been met – itself a demanding policy requirement. The Plan needs to recognise the potential role of other suitable sites being required to address the parish’s housing need.</p> <p>If reference to exception sites is added to the policy, the final paragraph would need to explain that market housing would only be permitted on such sites where it was necessary for the viability of an affordable housing scheme.</p> <p>It is unclear how the review of evidence by Fernhurst Parish Council would work in practice. It would be the LPA’s role to assess this material as the appropriate decision making body.</p>
Policy 4.42	The last sentence is factually incorrect. SDNPA will continue to give weight to this document as it was adopted by the Authority on becoming an LPA in 2011 until such a time as SDNPA deletes it and/or adopts new guidance.
Para. 5.2	Policy H1 of FNP does allow infill development but doesn’t specify a requirement for market housing only to be occupied households with a local connection. Similarly any other sites in the settlement policy area which come forward in accordance with H1 also are not required to be occupied by households with a local connection.
	Consideration of the individual site allocations (Policies SA1 to SA5) is set out in Appendix 5.
Policy EE5: Protection of important views from Fernhurst village	The commitment to protect views is welcomed however there is a danger that by singly out specific views for protection, there may be other views which need protecting but become devalued by not being mentioned in the Plan. The critical issue is the effect of development on the overall landscape character of which views/sightlines forms one part.
Policy DE2 – Building Materials	Relevant locally distinctive materials would be Midhurst sandstone and local brick (e.g. Pitsham brickworks).
Policies TO3 – Street furniture and TR2 Provision of Traffic Calming Measures	Both of these policies should acknowledge that a sympathetic design is required which is sensitive to the National Park context.
The Sustainability Appraisal	The Sustainability Appraisal tests two main strategic planning approaches, guided by the initial community engagement. One was a brownfield approach (whereby a package of brownfield sites is allocated) versus a greenfield approach reliant only on the use of greenfield sites. Supporting this ‘high-level’ testing is an analysis of all the proposed allocations, except Fernhurst Business Park, against the SA testing framework. This finds that the brownfield approach scores much more positively against the SA objectives and has many more “highly positive” effects. The Chichester District Council SHLAA (2010) identified 4 sites in Fernhurst parish in 2010. Three of the sites were considered to be suitable for development and most likely to come forward for development in years 6-10. A fourth site (land south east of Midhurst Road) was included despite some degree of policy conflict:

	<p><i>“This site is included in this SHLAA pending decisions on the eventual distribution of development. When considered against the provisions of the current Local Plan (the Chichester District Local Plan First Review 1999), this site would be contrary to certain policies (including Policy RE1, restricting development which does not require a countryside location and RE6, development in strategic gaps). However the Local Plan will be replaced by the Local Development Framework (LDF), which will revise and refresh those policies and include a review of settlement policy/built up area boundaries. In that respect this site could be suitable for housing development in the 2nd or 3rd phases of the LDF Core Strategy (ie post 2015, or post 2020).”</i> 2 other sites: Land at Cooksbridge and Land at Woodlands, Vann Common were identified by CDC as having no potential. SDNPA has developed a SHLAA Methodology and is undertaking a review of all SHLAA sites, including sites featured in the District Council SHLAA. It is too early to say whether these sites will be carried forward into the SDNPA SHLAA. SDNPA’s SHLAA methodology can be viewed here: http://www.southdowns.gov.uk/planning/planning-policy/local-plan/evidence-and-supporting-documents/strategic-housing-land-availability-assessment</p> <p>The sustainability effects of allocating the individual SHLAA sites has not been considered, only in broad terms through the greenfield option. A “review of all other land and sites around Fernhurst” was undertaken to identify potential sites not identified through the SHLAA (para. 6.7 of the SA). However, this concluded that most of these potential sites would not be available and certain sites were undevelopable because there was no access.</p> <p>We have a concern that some sites may not have been given sufficiently rigorous consideration. It may be possible to reduce the potential for negative effects on sustainability through allocating just part of a site or appropriate mitigation measures. An allocation on the settlement edge could enhance the transition between the built-up area and surrounding countryside or contribute to enhanced Green Infrastructure (this would need to be confirmed through more detailed analysis). It was reported at Planning Committee by officers that SDNP Local Plan could potentially allocate sites in Fernhurst (the ‘Preferred Option’ is expected to be published in early 2015). This would become necessary if evidence established there was unmet need not addressed by the neighbourhood plan and there were appropriate sites available to meet this need.</p>
<p>Landscape and Visual Impact Assessment (LVIA)</p>	<p>SDNPA’s Landscape Officer has reviewed the study and considers it does not adequately consider how the existing land uses on the sites relate to surrounding land uses or the landscape character of their setting. It is unclear how the proposed land uses would be able to enhance the setting of the sites. The mitigation options proposed do not consider the possibility of developable areas within any of the Chichester District Council SHLAA sites: the LVIA includes no ‘settlement edge’ impact.</p> <p>The Assessment does not consider the townscape of Fernhurst and how development could conserve and enhance this. The Guidelines for Landscape and Visual Impact Assessment, published by the Landscape Institute state that townscape quality should be considered . There is no supporting evidence to justify a ‘green-belt’ approach around Fernhurst village.</p>