



Fernhurst Neighbourhood Development Plan Decision Statement: November 2015

I. Introduction

- 1.1 Under the Town and Country Planning Act 1990 (as amended), the South Downs National Park Authority has a statutory duty to assist communities in the preparation of neighbourhood development plans and orders and to take plans through a process of examination and referendum. The Localism Act 2011 (Part 6 chapter 3) sets out the Local Planning Authority's responsibilities under Neighbourhood Planning.
- 1.2 This statement confirms that the modifications proposed by the examiner's report have been accepted, the draft Fernhurst Neighbourhood Development Plan has been altered as a result of it; and that this plan may now proceed to referendum.

2.0 Background

- 2.1 The Fernhurst Neighbourhood Development Plan relates to the area that was designated by the South Downs National Park Authority as a neighbourhood area on 13 September 2012. This area corresponds with the Fernhurst Parish Council boundary that lies within the South Downs National Park Local Planning Authority Area.
- 2.2 Following the submission of the Fernhurst Neighbourhood Development Plan to the National Park Authority, the plan was publicised and representations were invited. The publicity period ended on 13 June 2014.
- 2.3 Ms Deboruah McCann BSc MRICS MRTPI Dip Arch Con Dip LD was appointed by the South Downs National Park Authority with the consent of Fernhurst Parish Council, to undertake the examination of the Fernhurst Neighbourhood Development Plan and to prepare a report of the independent examination.
- 2.4 The Examiner's report concludes that subject to making the modifications recommended by the examiner, the Plan meets the basic conditions set out in the legislation and should proceed to a Neighbourhood Planning referendum.
- 2.5 Having considered each of the recommendations made by the Examiner's report, and the reasons for them, the SDNPA and Fernhurst Parish Council have decided to make the modifications to the draft plan referred to in Table I below, to secure that the draft plan meets the basic conditions set out in legislation.

3.0 Decision

3.1 The Neighbourhood Planning (General) Regulations 2012 requires the local planning authority to outline what action to take in response to the recommendations of an Examiner made in a report under paragraph 10 of Schedule 4A to the 1990 Act (as applied by Section 38A of the 2004 Act) in relation to a neighbourhood development plan.

3.2 Having considered each of the recommendations made by the Examiner’s report, and the reasons for them, South Downs National Park Authority in consultation with Fernhurst Parish Council has decided to accept the modifications to the draft plan. Table 1 below outlines the modifications made to the draft plan under paragraph 12(6) of Schedule 4B to the 1990 Act (as applied by Section 38A of 2004 Act) in response to each of the Examiner’s recommendations. A small number of the modifications vary slightly from that proposed by the Examiner. The SDNPA is confident that these minor variances do not impact on the Plan meeting the basic conditions.

Table 1.

Examiner’s recommended modification	Examiner justification & report reference	SDNPA decision
<p>General point Include a mechanism to monitor and review the Fernhurst Neighbourhood Plan.</p>	<p>At the point of examination the adopted Local Plan is the Chichester Local Plan 1999. However the SDNPA is progressing the South Downs Local Plan which will in due course replace the Chichester Local Plan. The Fernhurst NDP should be reviewed at this point to ensure it continues to be in general conformity with the strategic policies of the South Downs Local Plan.</p>	<p>Accept recommendation, text will be included in the Introduction of the Plan to state the Parish Council will consider whether a review of the NDP is required every 5 years or sooner in light of the significant of changes in planning policy to ensure the NDP continues to be general conformity with the Local Plan or other relevant plans.</p>
<p>Policy HI to read as: “New housing in Fernhurst will predominantly be delivered on the sites allocated in Policies SA1 to SA4. Infill developments will be permitted in addition to this total, subject to the other policies in the Neighbourhood Plan.</p>	<p>The requirements of the original policy are considered onerous and unachievable. There are significant costs and</p>	<p>Accept and make recommended modifications.</p>

<p>At least 80% of new dwellings shall be suitable for occupation by older persons. Such properties shall aim to fulfil the following criteria:</p> <ul style="list-style-type: none"> - Achieve Lifetime Homes standards, particularly in respect of wheelchair access. - Be a mix of 1-, 2- and 3-bed properties. <p>Developments must have a mix of housing sizes.</p> <p>In addition to the allocated sites in the Neighbourhood Plan, further market dwellings may be permitted if appropriate evidence of local need has been provided. This demand must be greater than that which is capable of being addressed by sites in the planning pipeline that are either in the parish or close to its boundary and which have a reasonable prospect of being delivered. Such evidence must be agreed jointly by South Downs National Park Authority and Fernhurst Parish Council. This requirement shall only apply to developments of five or more dwellings. In order to ensure the delivery of affordable housing to meet the needs of the Parish, any development of market housing will be expected to provide for affordable housing as required by Policy H2”</p>	<p>housing yield implications associated with the provision of Lifetime Homes and fully accessible units and an 80% requirement could be in conflict with National Policy.</p> <p>The penultimate paragraph of the policy is complex and the evidence required could be difficult to obtain and assess.</p> <p>(Pg.18)</p>	
<p>Policy H2 Affordable Housing</p> <p>Policy H2 to read as: “Affordable housing will be sought in line with adopted strategic policy (currently CDC Local Plan 1999 Policy H8 and Interim Housing Statement) and national guidance, unless stated otherwise for a specific site. 40% affordable housing will be sought on sites of 11 dwellings or more. 20% affordable housing will be sought where there are 6-10 net dwellings. The mix of affordable dwellings delivered, as part of any residential development shall seek to provide a split of social rented and intermediate properties in the ratio 60:40. This reflects the need for social rented properties along with the significant requirement for intermediate properties by those with a local connection to Fernhurst parish.”</p>	<p>Having considered the representations received in connection with this policy and the additional clarification provided at the Hearing it is considered that with modification this policy could comply with the Basic Conditions.</p> <p>For clarification this policy should reference the % of affordable housing required for any development in addition to how that provision will be split.</p>	<p>There appears to be an error in the recommended modification as the % thresholds do not correspond to the adopted strategic policy referred to in the Examiner’s comments. Policy shall be modified to reflect the correct thresholds as follows: 40% affordable housing will be sought on sites of 10 dwellings or more. 20%</p>

	(Pg.19)	affordable housing will be sought where there are 5-9 net dwellings.
<p>Policy SA1 Site Allocation – Oil Depot Site, Midhurst Road</p> <p>Remove policy from the plan.</p>	<p>The site is already the subject of a planning approval and is no longer relevant.</p> <p>(Pg.20)</p>	<p>Delete allocation and renumber subsequent allocations accordingly.</p>
<p>Policy SA2 Site Allocation – Former Syngenta Site, Midhurst Road</p> <p>Policy SA2 to read as: The former Syngenta site can be brought forward for a sustainable mixed-use development incorporating residential and commercial development and other suitable uses. Its location within a National Park means that any scheme must be of the highest quality in terms of its appearance and environmental sustainability. It must also maximise the potential to enhance biodiversity of the area and should ensure that visitors to the National Park are able to use the site as a base to explore the surrounding countryside.</p> <p>Proposals for this site are considered to be ‘major development’ and must therefore meet the exceptional circumstances tests set out in NPPF paragraph 116 and be in the public interest. Proposals must be exemplars of sustainable development and be masterplanned to support the development of a sustainable community within the parish of Fernhurst.</p> <p>Any planning application shall demonstrate how the development will address the following requirements:</p> <p>Housing</p> <p>- The development will deliver approximately 200 new build dwellings as part of a mixed-use scheme for the whole site and subject to an approved masterplan. This</p>	<p>The Examiner concludes that this policy promotes major development within the National Park and as such it is necessary for the policy to “have regard to national policy and advice.” Paragraph 116 of the NPPF states that:</p> <p>“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:</p> <ul style="list-style-type: none"> ● the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; ● the cost of, and scope for, 	<p>Accept recommended modifications, with the following amendments:</p> <p>The second criteria of the housing section to state: “50% of the new dwellings will be affordable subject to the viability assessment referred to above”</p> <p>This amendment is made to ensure the NDP gives due regard to national policy by ensuring the requirement is sufficiently flexible to take account of viability and changing market conditions over time (NPPF 50,173 & 174).</p> <p>In addition, the wording in</p>

<p>masterplan will take into account the aims of this policy, the viability of the scheme and the net benefits to the existing and future residents of Fernhurst and the Special Qualities of the National Park.</p> <ul style="list-style-type: none"> - 50% of the new dwellings will be affordable. - Any new build dwellings are subject to the Highfield building being demolished. <p>Residential care home</p> <ul style="list-style-type: none"> - If there is interest from a provider, then a residential care home for the elderly could be included as part of the development. <p>Employment</p> <ul style="list-style-type: none"> - Business use should support the National Park including the wood fuel economy. - Existing business use should be retained (with the existing buildings on the Longfield site being retained). The Pagoda building should be retained for commercial uses unless it is unoccupied and it can be demonstrated that there is no reasonable prospect of securing a new user through a robust marketing exercise agreed and approved by the South Downs National Park Authority. - Employment floorspace provision (B1/B2/B8) should be provided in accordance with the tests of Chichester Local Plan Policy B8. Provision of space for smaller businesses and as live-work units will be expected. <p>Leisure and tourism</p> <ul style="list-style-type: none"> - Tourism uses should include self-catering accommodation and provision for the visitor economy, with a tourist information and visitor centre that can be used as a shared facility with the wider community particularly welcomed. - An assessment of the leisure infrastructure needs of the community that can reasonably be accommodated on the site must be undertaken to inform any proposed scheme. This must involve a clear process of consultation with the Fernhurst community and any scheme must demonstrate how it has sought to best 	<p>developing elsewhere outside the designated area, or meeting the need for it in some other way; and</p> <ul style="list-style-type: none"> • any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. “ <p>In addition, the Examiner considers Strategic Policy B8 Safeguarding Business Floorspace of the Chichester Local Plan 1999 is relevant.</p> <p>The structure and wording of the original policy are also considered to be of concern as it contains challengeable housing figures, does not adequately secure the provision of a mixed use development and could be considered not to adequately address the sustainable development of the site.</p> <p>The Examiner concludes that these concerns can be overcome by appropriate re-wording.</p>	<p>regards to design and biodiversity will be improved to read:</p> <p>“It’s location within a National Park means that any scheme must be of the highest quality in terms of its appearance <u>design</u> and environmental sustainability. It must also maximize the potential to <u>enhance the</u> biodiversity of the area...”</p> <p>In order for the policy to be consistent with emerging Local Plan policy the text will be modified to read:</p> <p>“Proposals must be exemplars of sustainable development <u>sustainable and be assessed against the 8 principles of sustainable development. Proposals must be and</u> masterplanned...”</p> <p>Reference will be made to the 8 sustainability principles</p>
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<p>address these needs.</p> <ul style="list-style-type: none"> - The provision of allotments to serve the needs of the new resident population will be strongly supported. - Provision must be made for appropriate access to Fernhurst village and the surrounding countryside by sustainable modes. This must include the provision of access to existing footpaths and bridleways and bicycle hire or equivalent services. <p>Energy and utilities</p> <ul style="list-style-type: none"> - Any development must seek to maximise its energy generation from on-site renewable sources. - As part of any application, a Sustainable Water Strategy must be provided. - The culverted watercourse must be restored to a surface flow feature as part of a site-wide sustainable drainage scheme. <p>Transport</p> <ul style="list-style-type: none"> - As part of any application a package of sustainable transport solutions must be provided that integrates sustainable modes of transport including walking, cycling, buses, electric cars and car sharing. In particular, sustainable linkages to Fernhurst village, Haslemere, Midhurst and the King Edward VII site should be provided. <p>Design</p> <ul style="list-style-type: none"> - The masterplan will be expected to integrate sustainability principles into the design of proposals and provide an accompanying sustainability audit against the ten sustainability principles and targets used by SDNPA to underpin its emerging Local Plan. The masterplan should aspire to achieve the best performance against the ten principles and demonstrate their commitment to the same through the objectively assessed process. - Any design must deliver substantial environmental improvements, respond to local distinctiveness and the site's natural setting within the National Park, recognise local 	<p>The supporting information should also clearly address the exceptional circumstances tests.</p> <p>(Pg. 24-25)</p>	<p>in the Local Plan throughout the policy and supporting text.</p> <p>Reference to 'an approved masterplan' will be removed as there is no statutory mechanism for the NPA to approve a masterplan that is not a Supplementary Planning Document or Area Action Plan.</p> <p>The supporting text will be updated as per Appendix I.</p> <p>An additional evidence base document is provided setting out how the Syngenta allocation addresses the exceptional circumstances tests.</p> <p>Renumber policy as SA I.</p>
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cultural heritage, must be reflective generally of its natural setting in an area of high landscape value and should incorporate a significant area of high quality public realm into any layout.

Landscape

- Any development must demonstrate how it has been informed by published guidance of relevance regarding landscape matters. Any application must be accompanied by a Landscape Visual Impact and Landscape Character Assessment; this should include consideration of the impact upon 'covenanted' and key views.
- Built development should be restricted to the areas that were previously developed, with important native trees retained.

Biodiversity

- Any application must be accompanied by an appropriate Phase One habitat survey and green infrastructure strategy.
- Any development must provide a net gain in biodiversity and natural habitats through an ecosystems services approach. For individual biodiversity assets, any adverse environmental impacts must be appropriately mitigated.
- A contaminated land site investigation and risk assessment must be undertaken prior to the submission of any application.
- An assessment of the biodiversity of the site and its ecological importance must be integral to any development proposals. The relationship with the surrounding natural environment must be improved, taking an ecological approach to open green space to enhance existing features and provides and creates corridors/green links between and around the development and the National Park.
- Development must include the creation of high quality habitats.

Other uses

- Other land uses, which meet the requirements of the Neighbourhood Development

<p>Plan and the Local Plan, cater for local needs and support the purposes and duty of the National Park will be supported. This may include a hotel.</p>		
<p>Policy SA3: Site Allocation – Hurstfold Industrial Estate, Surney Hatch Lane</p> <p>Policy SA3 to read as:</p> <p>This site could be considered suitable for a mixed-use development to include up to 10 residential units. These homes shall provide a mix of unit size and a mix of tenure in line with Policy H2.</p> <p>The existing B1 and B2 space should be retained on site unless as part of a comprehensive redevelopment scheme an alternative acceptable site for the B1 and B2 floor space is proposed within the Parish. In this case the construction of the appropriate new class B1 and B2 floorspace shall be secured by a Section 106 agreement, which will require the completion of the new B1 and B2 floorspace prior to the occupation of the first new home at Hurstfold.</p> <p>The design of any new buildings on the site will be required to demonstrate how it relates to the local character and is appropriate to its rural location and avoids a suburban feel (Guidance is provided in the Fernhurst Village Design Statement).</p> <p>New commercial development must demonstrate design principles that ensure it is in keeping within the surrounding landscape and does not have a negative impact on the amenity of adjacent residential properties. If existing commercial units are retained on the site as part of a mixed use development, then it is expected that the visual appearance of these will reflect the quality of a newbuild commercial development of similar use (such as permitted scheme FH/07/04247/FUL) and will also be appropriately landscaped.</p> <p>Any application must also be accompanied by a detailed landscaping scheme, which reflects the prevailing landscape character of the Low Weald Character Area. The detailed landscaping scheme should include mitigation, for example through the restoration of the former glasshouse area to agriculture/woodland. Guidance is</p>	<p>The Examiner considered the original policy to be contrived and require actions, which fall outside the control of the planning system. The affordable housing requirement conflicts with policy H2. Modifications recommended to meet the Basic Conditions.</p> <p>(Pg. 29)</p>	<p>Accept and make recommended modifications and update supporting text accordingly (see Appendix II).</p> <p>Re-number policy as SA2.</p>

<p>provided in the South Downs Integrated Landscape Character Assessment for the Low Weald character area.</p> <p>In order to address potential ecological impacts a Phase One habitat survey will be required to accompany any application together with a long term Landscape and Ecology Management Plan.</p>		
<p>Policy SA4: Site Allocation – Bridgelands Site, Verdley Place</p> <p>Policy SA4 to read as:</p> <p>This site could be developed for up to 10 residential units. These units shall provide a mix of unit size and tenure in line with Policy H2.</p> <p>Access must be provided to and from Lickfold Road. Access to the site from Verdley Place will not be permitted.</p> <p>Built development must be directed towards the previously developed parts of the site. Development of predominantly green parts of the site will not be permitted.</p> <p>The existing mature trees on the site shall be retained and new planting will be provided in order to appropriately screen the new dwellings from existing neighbouring residential properties.</p> <p>Design and landscaping of any development must be of the highest standards and the design of any new building on the site will be required to demonstrate how it relates to the local character and is appropriate to its rural location and avoids a suburban feel. Guidance is provided in the Fernhurst Village Design Statement and in the South Downs Integrated Landscape Character Assessment for the Low Weald character area.</p>	<p>Address conflict between affordable housing requirement and Policy H2. Provide sufficient protection for the special landscape character by referring to the requirements for a long term landscape and ecology management plan for the site. (Pg. 31)</p>	<p>Accept and make recommended modifications and update supporting text accordingly.</p> <p>Renumber policy as SA3.</p>

<p>In order to address potential ecological impacts a Phase One habitat survey will be required to accompany any application together with a long term Landscape and Ecology Management Plan.</p>		
<p>Policy EE5: Protection of Important Views from Fernhurst Village</p> <p>Include policy reference to a map identifying the important views referred to in this policy.</p>	<p>To make the policy more robust.</p> <p>(Pg.34)</p>	<p>Accept recommendation, reference to map showing important views will be included in the policy wording.</p>
<p>Policy EMI: Additional Commercial Floorspace at Fernhurst Business Park, Midhurst Road</p> <p>Policy EMI to read as:</p> <p>The continued use and development of Fernhurst Business Park for commercial (Class B) uses is supported. To maintain its value as a local employment site serving the parish, the following developments will be permitted:</p> <ul style="list-style-type: none"> - Changes of use of individual buildings within the B-Use Class (B1/B2/B8) - Alterations and small-scale extensions to existing buildings - Redevelopment of existing buildings to provide replacement commercial floorspace of a similar scale. <p>In each case, such development will be required to be of a similar scale and layout to the existing development on the site and should respect the rural setting of the site.</p> <p>Associated parking provision and the impact of additional traffic generated by the development must be acceptable to the highway authority. Any additional access in a proposal will be subject to an assessment of highway and environmental impacts.</p> <p>Applications for new development on the site must be accompanied by a Visual</p>	<p>To address concerns regarding new built commercial development, the area for potential new build should be more accurately defined and requirements made for visual impact assessment, a landscape strategy and assessment of highway and environmental impacts.</p> <p>(Pg.39)</p>	<p>Accept recommended policy text and remove blue boundary from map on page 68.</p>

Appendix I

Modified supporting text for Policy SAI Syngenta Site, Midhurst Road

Context

- 1.1 The largest brownfield site in the parish that is considered to be available, suitable and achievable for delivering some residential development as part of a mixed use scheme is the former Syngenta site. This is approximately 1.2 miles to the south of Fernhurst village centre.
- 1.2 The site comprises 11.3 hectares (28 acres) of previously developed land although some of this land is existing woodland. The site was developed as an army barracks at the end of World War II.
- 1.3 Planning permission was obtained in the 1980s by ICI for development of the site to provide offices and research laboratories in connection with their agri-chemical business. Although used for commercial purposes prior to this, it was this development which provides the majority of the buildings remaining on the site today. The premises were vacated over ten years ago and the site subsequently sold.
- 1.4 An industrial unit was constructed and is currently occupied by John Nicholson Auctioneers and a number of other businesses. The office building built by ICI, known as the Pagoda, is currently occupied by Aspinall of London.
- 1.5 The site has a certificate of lawful use for conversion of the Highfield office building to residential uses.
- 1.6 The general principles shown below assume that the Highfield building is demolished and that 200 dwellings are delivered as part of a comprehensive redevelopment of the site.

General principles

- 1.7 In the adopted Chichester Local Plan, the site is protected for employment use. The emerging South Downs National Park Local Plan states that a mix of uses could be appropriate for the site.
- 1.8 The National Planning Policy Framework (NPPF) says that the development of major sites in national parks can only be permitted in 'exceptional circumstances and where it can be demonstrated they are in the public interest'. Paragraph 116 lists the matters which should be considered:
 - The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and

- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
- I.9 The Syngenta site is one of the few major development opportunities in the National Park and housing needs are considerable. Working with the SDNPA it is considered that this represents a significant opportunity to address housing needs in the South Downs National Park as part of a mixed use development.
- I.10 The need is for a development that meets the purposes and duty of the South Downs National Park Authority and, in particular, conserves and enhances the landscape through the re-use of the site. As part of this, it is important that it makes a clear contribution towards the achievement of the eleven outcomes in the SDNPA's Partnership Management Plan¹.
- I.11 The task of reflecting and justifying an appropriate mix and scale of development in such a location is a challenging one. The process of developing the Neighbourhood Plan has established the following principles which it is considered will not undermine the need to ensure viability, as required by the NPPF, whilst at the same time respecting the location of the site within a National Park:
- i. Development at Syngenta should be seen as being complementary to the main settlement of Fernhurst village. It should not provide uses that will compete with those that are in the village.
 - ii. The site has existing buildings on it and therefore any development must seek to strike a balance between the re-use of these existing buildings (recognising the embodied energy and lower cost for potential users) and the benefits of replacing them with modern buildings of a high energy-efficient specification. Built development should be restricted to the area which was previously developed, retaining the existing areas of woodland on the site.
 - iii. Any residential development should seek to provide principally for the needs of local people, both for affordable and market housing.
 - iv. To support the new residents, it is important that the potential for people to access links to Fernhurst village by non-car modes are maximised.
 - v. The most recent use and designation of the site was for commercial purposes providing employment and this should remain a fundamental part of any redevelopment.
 - vi. The existing businesses located on the site should be encouraged to remain, with their future floorspace needs taken into consideration.
 - vii. The site provides an opportunity to promote the National Park as a tourist destination by offering leisure opportunities and access to the surrounding countryside. This should also recognise the leisure needs of the new residents as well.

¹ <http://www.southdowns.gov.uk/about-us/management-plan>

- viii. The site is in a sensitive location in terms of the landscape and biodiversity. Any development must ensure that impacts are minimised and if they do arise, can be appropriately mitigated.
 - ix. Reflecting its setting in a National Park, design is an important consideration. Any development must demonstrate that it is of the highest quality and in keeping with the surrounding landscape.
 - x. Any development must seek to maximise its energy generation from renewable sources.
- I.12 All of these principles are important but the most fundamental overarching principle is that any mix of uses on the site represents a quantum of development that is sustainable. The site is remote from Fernhurst village and the potential to provide non-car linkages will be challenging. Therefore movement by residents, workers and visitors will mostly be car-based, although given the limited amount of services within Fernhurst village, the same would broadly be true of developments located there. With the site being in a National Park and the NPPF stating that major developments in such locations should only be permitted in exceptional circumstances, a clear and robust framework for development is considered to be necessary.
- I.13 Proposals for this site are considered to be 'major development' and must therefore meet the exceptional circumstances tests set out in NPPF paragraph 116 and be in the public interest. It was demonstrated at the plan making stage how the development of Syngenta could in principle meet these exceptional circumstances and was in the public interest. The justification of this is set out in the document 'Exceptional Circumstances and Public Interest Justifying Allocation of Syngenta Site', which forms part of the evidence base for this Neighbourhood Plan. Any planning application for the re-development of the site will need to be supported by a full justification that it meets the exceptional circumstances tests set out in NPPF paragraph 116 and be in the public interest.
- I.14 Prior to planning permission being sought for any development at Syngenta, a masterplan shall be prepared and shall then be submitted as part of the evidence in support of the planning application. The masterplan should be prepared in consultation with relevant parties including the SDNPA and Fernhurst Parish Council and shall be considered by the SDNPA Design Review Panel as part of that process.

Housing

- I.15 It is important that a balance is struck between delivering a level of housing at the Syngenta site that is not in conflict with the purposes of a National Park (and the avoidance of delivering unrestricted market housing) whilst still ensuring that advantage is taken of a large brownfield site and its ability to address housing needs within this part of the National Park. An additional important consideration is that the mix of uses must ensure that development can come forward and is not deliberately stifled.
- I.16 It is considered that the site should deliver 200 dwellings based on the evidence provided by the Strategic Housing Market Assessment, the Strategic Housing Land Availability Assessment and viability testing. This seeks to strike a balance between ensuring a viable development and addressing housing needs while promoting the National Park Purposes and maximise ecosystem services.

- I.17 Given the primary requirement to address affordable housing needs in the SDNP, the site should provide 50% of the dwellings as affordable units. This reflects the focus of the DEFRA Vision and Circular for English National Parks and Broads 2010 and the requirement in the emerging SDNPA Local Plan.
- I.18 In order to provide a mixed and inclusive development, which is important given the site's location away from other residential areas, the affordable housing must be indistinguishable from market housing and should be scattered throughout the residential part of the site.
- I.19 The residential part of any proposal must be in accordance with the other policies in the Neighbourhood Plan, particularly policies H1 and H2 relating to housing mix. Housing not needed to meet local needs should be limited to that necessary to ensure the viability of the scheme and an appropriate social mix.
- I.20 Any new build dwellings are subject to the Highfield building being demolished.

Employment and retail

- I.21 The existing commercial buildings on the Longfield part of the site, in the west, should be retained. The Longfield buildings currently house a number of thriving businesses and these businesses should be retained and given the opportunity to expand. One of these businesses – Aspinal of London – is a growing business and it will be important if they are to stay in Fernhurst that there is commercial space for them to expand if they need to in the future. Therefore, it is appropriate that new employment space should be included as part of any development proposal in order to accommodate the future needs of these businesses and to attract new businesses to Fernhurst.
- I.22 The Neighbourhood Plan does not seek to identify specific quantum of development that should be delivered. This should be considered at the time of an application, based on the commercial market and the need for particular types of commercial floorspace. However, it is envisaged that any demand for floorspace is likely to be focused on the office or light industrial market. The design of any commercial buildings should be compatible with a residential-led mixed use development.
- I.23 In addition, Aspinal of London occupies space in the existing Pagoda building, adjacent to the Highfield building. Given that the occupier has expressed a wish to stay in this building and considers it meets their requirements in its current state of repair, then this building should be retained for commercial use. The building provides just over 2,000m² of office floorspace which, whilst relatively large, is not excessive in this location. It therefore retains a reasonable prospect of continuing to provide employment and does so in what many in the local community consider to be an iconic building. Only if the building was vacant and it could clearly be demonstrated that there was no prospect of it being occupied, could the building be demolished.
- I.24 As stated earlier, the Highfield building has a certificate of lawful use for conversion to residential properties. This could therefore be delivered at any time up to 30th May 2016 (or any subsequent extension to the Permitted Development exemption) without the need for planning permission to be sought for change of use and it is outside the scope of the Neighbourhood Plan to influence this. However, in order to ensure, if this residential

conversion is not undertaken, that the required number of dwellings sought by Policy SAI are delivered as part of a comprehensive scheme, the Highfield building should be demolished as part of any redevelopment. This building has been unoccupied since ICI vacated it over ten years ago and there has been no commercial interest in it. The reason for this is most likely related to its scale – nearly 17,000m² of floorspace – and location away from any core commercial centre. It is not considered that there is a reasonable prospect of this building being let and the NPPF says that such allocations should not be retained in such circumstances. In addition, it is in poor state of repair and the Neighbourhood Plan is seeking buildings of the highest design and environmental quality. Therefore, it is considered most appropriate to demolish the building.

Leisure and tourism

- I.25 The engagement throughout the Neighbourhood Plan process identified limited need for additional community facilities by existing residents. However, with growth in the community, it is important that the needs of the changing population are met as they arise. Development must therefore recognise that there is likely to be a need for community facilities on the site. Any promoter of development on the site must engage with the community to understand what its needs are moving forward and must seek, where possible, to provide for these needs within the mix of uses. This should be done to inform the overall mix of uses proposed and it must be clearly demonstrated that the community has been fully consulted.
- I.26 The provision of community uses could be linked to the improvement of the tourism offer and specifically the development of a tourist information and visitor centre. This would fit well with the SDNPA objective of expanding the tourist offer and Fernhurst's role as a gateway to the National Park. A facility, shared by the community and visitors alike, could ensure that any building is used to its maximum potential.
- I.27 One particular use that may be considered beneficial in addressing the needs of the new community is the provision of allotments. Their inclusion in any overall masterplan will therefore be strongly supported.
- I.28 Related to the expansion of the tourist offer, the development must seek to exploit opportunities for woodland and wildlife walks and the wider public right of way network connecting the Syngenta site with its surroundings. This should seek to include the enhancement of links to wildlife corridors within and adjoining the site. Development of the built form must effectively integrate the development with this.

Energy and sustainability

- I.29 Any development must ensure that the highest practicable environmental standards of both new and existing buildings are met. Where possible, the development should seek to achieve a zero carbon standard for new buildings and BREEAM Excellent or Outstanding for any new commercial floorspace.
- I.30 The site should seek to maximise its energy generation from renewable sources, where possible utilising technologies such as combined heat and power (CHP), photovoltaics and heat pumps to serve new buildings as well as the existing buildings on the site.

I.31 The construction process should seek to source local materials and labour in order to reduce the carbon emissions associated with it.

Transport and movement

I.32 The development should provide an integrated package of sustainable transport solutions which enable access to local facilities and services and should provide the following:

- links to Fernhurst village, Haslemere, Midhurst and King Edward VII site;
- submission and approval of a Travel Plan;
- bicycle hire scheme;
- appointment of a Travel Plan coordinator;
- an electric car club or car sharing scheme; and
- provision of electric vehicle charging points.

I.33 Generally, such a package should also meet the further requirements of Local Plan transport policy.

I.34 The development should seek to provide new walking and cycling routes that link the site with Fernhurst village. This must ensure that these routes are sufficiently attractive and safe to encourage their regular use by both residents and tourists and link to the wider public access network.

I.35 Where possible, there should be integration of all sustainable modes of transport, including public transport and through the exploration of the potential for a community/demand responsive bus.

Landscape

I.36 One of the fundamental purposes and duties of the SDNPA is to ensure that development minimises its impacts on the landscape. Given its scale, this is particularly important for the Syngenta site.

I.37 The Fernhurst Neighbourhood Plan Landscape and Visual Impact Assessment considers that careful redevelopment should not result in any negative impacts on the landscape and could also serve to restore and enhance the landscape. It will be important that a detailed landscape and visual character assessment is undertaken and accompanies any planning application. This will need to take into consideration the impact that any development may have upon 'covenanted' views from Blackdown Hill as well as other views of importance.

- I.38 Any development must demonstrate how it has been informed by the South Downs Integrated Landscape Character Assessment, the West Sussex County Council Land Management Guidelines and the Fernhurst Neighbourhood Plan Landscape and Visual Impact Assessment, as well as any other published guidance of relevance.
- I.39 Hard and soft landscaping should be of the highest quality, utilising local materials, respecting the natural setting and enhancing the distinctive landscape qualities of the National Park. Built development should be restricted to the areas that were previously developed, with important native trees retained.

Design principles

- I.40 The masterplan, to which reference is made in paragraph I.14, is required in order to ensure that development proposals are sustainable and that they do not have a significant adverse impact on the natural environment. The masterplan will be expected to integrate sustainability principles into the design of proposals and provide an accompanying sustainability audit against the eight principles and targets. The masterplan should aspire to achieve the best performance against the eight principles and demonstrate their commitment to the same through the objectively assessed process. SDNPA will be happy to provide further guidance on assessment criteria and support to ensure the best value is derived from this process. The principles are:
- Zero Carbon
 - Zero Waste
 - Sustainable Transport
 - Sustainable Materials
 - Sustainable Water
 - Land Use and Wildlife
 - Culture and Community
 - Health and Wellbeing
- I.41 It is vital that any development achieves the highest possible design standard compatible with the setting of the site. The applicant must work closely with the SDNPA and Fernhurst Parish Council in order to establish the design principles and how these can be achieved. This should be secured through the masterplanning process.
- I.42 The design strategy will address the following:

- Design must respond to local distinctiveness and the site's natural setting within the National Park.
- Any design must deliver substantial environmental improvements and remediation of the existing brownfield site and expansive areas of built form and ground cover.
- Development must recognise the local cultural heritage, including the green villages of the Western Weald, and must be reflective generally of its natural setting in an area of high landscape value.
- The extent to which the built form responds to its position within a 'bowl' largely surrounded by hills and therefore significantly visible from several aspects. The previous development of the site by ICI provides some good examples of how the impact of the built form could be minimised.
- A landscape framework and planting strategy, which will be produced as a driver for the designed layout, that integrates the development within the landscape and shows how the new built edges will be formed and managed. It must demonstrate how existing trees and hedgerows will be retained, incorporated, and extended/enhanced as part of the proposed organisation of built form. It will be integrated with the provision of sustainable drainage systems.
- A strategy for new planting, the extent of which must not just be confined to the edges of proposed new development. The landscape strategy will demonstrate how the countryside can be drawn into the new built form (particularly the residential parts of any scheme) through the integration of multi-functional green spaces – that combine with street trees, courtyard and garden planting.
- A clear design approach to the edge of the built form to allow managed transition between development and countryside, and to allow easy and convenient access through the site to the countryside beyond.
- Vehicle parking will be an integral part of the plan for the scheme, to ensure limited impact on visual amenity and residential privacy. Any surface level parking areas will make provision for sustainable drainage systems (SUDs) and generous planting in order to aid visual containment and help to ameliorate the effects of climate change.
- A phasing strategy which prioritises the provision of non-vehicle links, landscape planting and the provision of supporting services within the early years of the scheme.
- A significant area of high quality public realm should be incorporated into any layout.
- The maintenance of public spaces, street furniture and boundaries formed by retained trees and hedges will be carefully considered in the early design stages with maintenance responsibilities agreed between all parties.
- Any potential archaeological constraints must be thoroughly researched and any impacts must either be avoided or appropriately mitigated.

Biodiversity

- I.43 The setting of the site is within an area of considerable biodiversity value. Development must not negatively impact on this and the general principle should be that development achieves a net gain in biodiversity and natural habitats and successfully mitigates any adverse environmental impacts on individual biodiversity assets. This should be achieved through an ecosystems services approach
- I.44 In particular, it is vital that the biodiversity assets adjacent to the site – including the Cooksbridge Meadow Local Nature Reserve – are conserved and enhanced.
- I.45 In order to ensure that ground conditions are suitable for development, any applicant must have carried out a contaminated land site investigation and risk assessment, prior to the submission of any application. Development will only be granted permission once any required mitigation measures have been agreed with the local planning authority.
- I.46 An assessment of the biodiversity of the site and its ecological importance must be integral to any development proposals. Relationships with the surrounding and adjoining natural environment will need careful consideration in order not to result in conflicts. Wildlife corridors and areas will be required within and across the site.
- I.47 The relationship with the surrounding natural environment must be improved. An ecological approach to open green space will be required which enhances existing features and provides and creates corridors/green links between and around the development and the National Park. Development must include the creation of high quality habitats, particularly Biodiversity Action Plan (BAP) habitats, referring to the adjoining Cooksbridge Meadow Local Nature Reserve and to Snapes Copse and Verdley Wood Biodiversity Opportunity Area, with the addition of buffer areas adjacent to existing woods.
- I.48 In order to address these requirements, a green infrastructure strategy and appropriate Phase One habitats surveys will be required to accompany any application. It is expected that applicants will work with appropriate partner bodies in undertaking these studies.

Appendix II

Modified supporting text for Policy SA2 Hurstfold Industrial Estate, Surney Hatch Lane

1. Paragraph 5.46 in the supporting text should be amended as follows:
~~'Alternative uses for the site have been considered, including residential, leisure and commercial uses. However, no viable alternative to a residential use has been identified. Such~~ It is considered that a re-development involving residential uses would provide a greatly improved environment for two adjacent residential properties...'

2. Paragraph 5.52 in the supporting text should be amended as follows:
~~'In total, the site is considered suitable for up to ten dwellings with appropriate landscaping. There must be a mix of unit sizes to address the need for smaller units within the parish, so development must accord with the requirements of Policy H1. It is accepted that, given the location away from the main settlement of Fernhurst, this is not an ideal location for social rented units. Nevertheless, affordable housing would be expected to be provided as part of any development. It is therefore considered that a greater proportion of affordable housing should be delivered as intermediate units which more commonly are occupied by those with independent means of transport such as access to a car. As such, and given the requirements of Policy H2 in respect of intermediate properties, the location away from the main settlement is less of a fundamental issue but the site is still able to address the need for affordable housing as required by the National Parks Circular.'~~