

04 December 2015

Kevin Jones
Clerk to Rogate Parish Council

Dear Mr Jones,

Subject: South Downs National Park Authority (SDNPA) response to the Pre Submission version of the Rogate & Rake Neighbourhood Development Plan

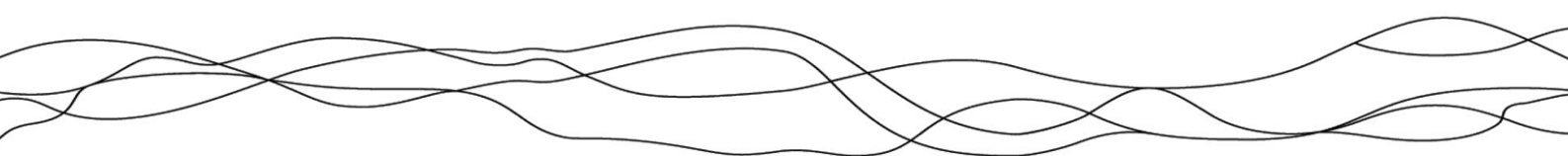
Please find below the SDNPA representation on the Pre-Submission version of the Rogate & Rake Neighbourhood Development Plan (RRNDP). As per our normal procedures at this stage, these are Officer level comments that have not been to committee for Member approval.

The SDNPA would like to commend the hard work and effort of the Neighbourhood Planning group and Rogate & Rake Parish Council in the preparation of the RRNDP. We recognise that localism and planning in a protected landscape is challenging, and that the group have to balance the aspirations of residents and visitors with the challenge of conserving and enhancing the special qualities of the South Downs National Park.

Please note that not only does the following set of comments contain those from the SDNPA but we have also coordinated for you those from Chichester District Council, which we hope you find helpful. We are aware that some of the issues we raise may be of concern to you and therefore if you have any questions regarding our representation please do not hesitate to contact me.

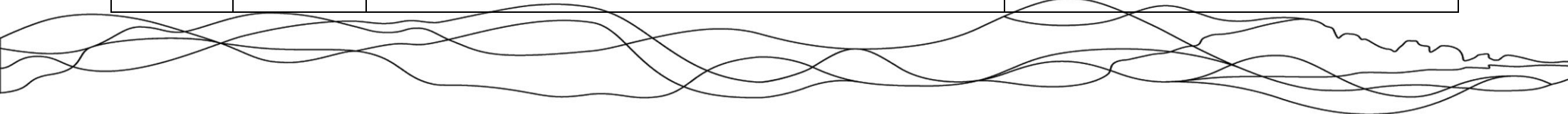
Yours Sincerely

Sarah Nelson
Strategic Planning Lead



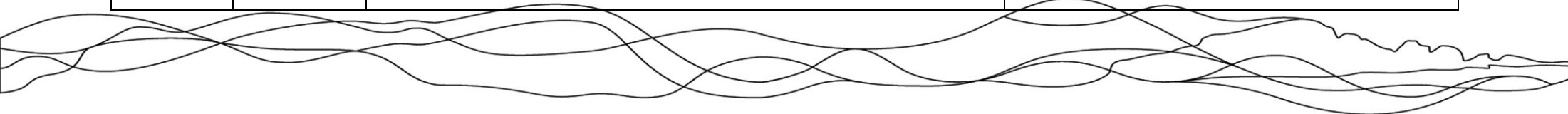
SDNPA response to the pre submission Rogate and Rake Neighbourhood Development Plan

Page number	Section	Comments	SDNPA Recommendation
Throughout		To help navigate the document, it would help to have paragraph numbers. This will also assist greatly when it comes to submitting the plan for Examination.	Add paragraph numbers
Throughout		The document is lengthy and occasionally contains unnecessary detail and repeats information. The first policy does not appear until page 35 and although the context is well written and informative, many will find this level of detail off putting. However the use of maps and photographs is welcomed.	Consider reducing the length and detail at the start of the document.
Throughout		The use of the abbreviation NP for Neighbourhood Plan can become easily confused with National Park. It is suggested you use the abbreviation NDP (Neighbourhood Development Plan) to avoid any misunderstanding.	Remove abbreviations or replace NP with NDP.
Throughout		In terms of the policies there is a need to clearly define, perhaps by use of bold text or a box, the policy and what is supporting text. Phrases such as ‘Applicants are encouraged to.....’ should not appear in the policy itself. Planning policies should give as much certainty as possible to the applicant.	Clearly distinguish between policy and supporting text. Ensure policies are written in a way that provides as much certainty as possible.
8	1.1, 1 st paragraph	We note that the plan period stretches beyond that of the South Downs Local Plan. In order for there to be consistency it is recommended that the plan period for the Rogate & Rake NDP (RRNDP) extends to 2032 rather than 2035.	Reconsider plan period.



Page number	Section	Comments	SDNPA Recommendation
8	1.1, 1 st bullet point	With regard to lack of financial wherewithal to fund community initiatives, there could be a reference to the possible use of CIL funding	Consider reference to CIL
8	1.1, 2 nd bullet point	Correction required – refers to “National Policy Framework”	Insert “Planning” if referring to the NPPF
11	Plan Area	Image appears fuzzy	Consider sharpening image
12 & 33	2.3: The planning policy context and	The RRNDP should include greater reference to the emerging SDNPA Local Plan. The South Downs Local Plan: Preferred Options was consulted on in the Autumn of 2015 and the National Park Authority are now considering the representations received and will be revising the policies as required. Section 2.3 should be updated accordingly.	Update references to the South Downs Local Plan throughout the RRNDP
13	2.4: The special role of the South Downs National Park	It may be worth emphasising that if there is a conflict, the first of the two national park purposes takes precedence. The text goes on to state that a key purpose of the RRNDP is to “preserve” special qualities. It would be better if this could be changed to “conserve” in order to align with national park purposes	Consider rewording
14	2.5: Consultation and engagement, 1 st Bullet point	1 st bullet point refers to “members” of the SDNPA. This should be changed to “officers” or “representatives”	Consider rewording
17	3.4 The	LNR, SPA and SAC should be worded in full if they are to be referred	Consider rewording

Page number	Section	Comments	SDNPA Recommendation
	natural environment of the Parish	to, even though there aren't any such designations within the parish	
18-19	Maps	Maps appear rather small. It may be beneficial to make these larger.	Consider larger maps
20	The built environment (final paragraph)	Registered village greens are not the same as Registered Commons (even though OS maps describe it as "Fyning Common")	Correct reference to Fyning Recreation Ground
22	3.6, 4 th paragraph	<p>The plan states there has been no formal housing needs – based assessment and that the number of new homes being proposed for Rogate has not been rigorously tested. This is not entirely correct. Policy SD23 of the Local Plan Preferred Options sets a housing requirement of 4,596 homes (net) for the plan period 2014-2032. The annualised requirement is 255 dwellings per annum and based upon evidence in the 2015 South Downs Strategic Housing Market Assessment.</p> <p>We have a landscape-led Local Plan and in line with the first purpose of the National Park we had to ensure that any housing development did not detract from the natural beauty, wildlife or cultural heritage of the National Park. We have used a wide ranging evidence base in support of this including Viewshed, Tranquillity and Habitat Connectivity. These all fed into the Strategic Housing Land Availability Assessment (SHLAA) along with other evidence for example on highways and flooding.</p>	Remove sentence or clarify.



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		<p>We are not a wilderness National Park and there were a wide range of options considered in regard to the housing requirement ranging from zero net migration which would have resulted in a declining overall population to meeting our full objectively assessed need which would have unacceptably harmed the landscape. All these options were explored through the Sustainability Appraisal (SA) and the preferred option is for a 'medium' level of growth 'dispersed' across the National Park. This will ensure that our villages and towns remain vibrant settlements without damaging the special qualities of the National Park.</p> <p>The responses to the Preferred Options consultation will help the National Park to refine these housing figures and forms a further part of the testing that is required.</p>	
22	3.6, 4th paragraph	<p>It will be difficult to provide 50% affordable housing, especially if the sites coming forwards are 5 dwellings or less (as identified on page 39). The current adopted affordable housing requirement for Chichester District is 40% on sites of 10 or more and 20% on smaller sites. The emerging South Downs Local Plan policy is for at least 40% affordable housing. In addition, the reference to the need for "smaller one, two or three bed dwellings" (particularly 1-bed) needs to be backed up by evidence</p>	Provide evidence of need – particularly for 1-bed dwellings.
26	3.9, 1 st paragraph	<p>The use of the term 'fabric first' needs further clarification (it is also referred to on page 20).</p>	Links to where further information could be found would be helpful.
27	3.10.1	<p>The following text is taken from the Community Right to Bid scheme</p>	The relevant Local Authority holds the register of assets of Community Value – in this case

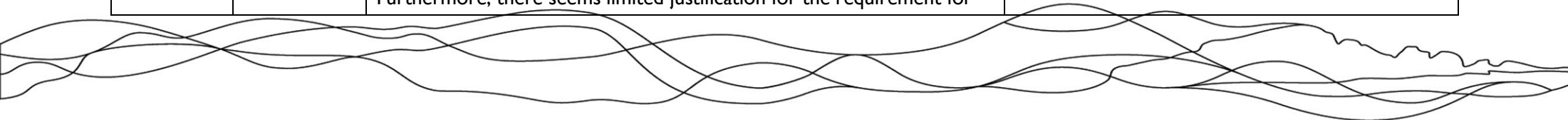
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		<p>which was provided under the Localism Act.</p> <p>A building or piece of land will be deemed to have community value only if:</p> <ul style="list-style-type: none"> • The use of the land or building currently, or in the recent past, furthers the social wellbeing or cultural, recreational or sporting interests of the local community. • This use (as described above) of the building will continue to further the social wellbeing or interests of the local community. • The use of the building or land must not be deemed ‘ancillary’, i.e. of secondary purpose. This means that the use of the land or building to further social well-being or interests of the community must be its principle use. <p>If a building or piece of land is listed as an ‘asset of community value’ and the owner wants to sell the asset, they must inform the local authority. This will then trigger a moratorium period during which the owner cannot conclude the sale of the asset.</p>	<p>Chichester District Council. Registration is a separate process to the preparation of the NDP.</p> <p>In light of the guidance we suggest that you review the properties identified. Is there any prospect of the asset being sold and equally is there any prospect of the community wanting to or being able to purchase it.</p>
30	4.0 Vision and objectives	This may benefit from being placed at the front of the document	Consider moving section
35	Policy EMI: Conserving and enhancing	4 th bullet requires that proposals prevent existing development from contributing to or placed at risk As a sentence this makes little sense and in addition planning is not the correct mechanism through	Reconsider and reword policy.

Page number	Section	Comments	SDNPA Recommendation
	the natural environment	<p>which to prevent existing issues.</p> <p>2nd sentence below bulleted list – confusing and difficult to apply. Reference is made to important views within the Plan area – these need to be defined and shown on a map. In addition there are unlikely to be any proposals in Rogate which could be viewed from outside of the National Park.</p>	
37	5.4, 6 th paragraph	Reference to visual impact assessment is probably incorrect in this instance, it is suggested that this might be referring to the emerging SDNPA Design policy?	Reconsider and reword policy.
37	Policy BE1: Locally distinctive design within the Parish, 3 rd bullet	It is not clear what the ‘views of Parish importance’ are. These are not clearly identified in Policy EMI. As per comments on policy EMI important views need to be defined and shown on a map.	Clarify what views are being referred to.
38 / 39	Housing	<p>The SDNPA has some concerns about the reference to in-perpetuity affordable housing which is unlikely to be in line with national guidance.</p> <p>Ensuring that small properties are provided or remain in the housing market can be a matter addressed within the NDP, provided there is the evidence to support any approach you may wish to take. However if you feel it is adequately addressed by the emerging SDNPA Local Plan then there is no need to duplicate this work.</p>	Reconsider and reword policy.

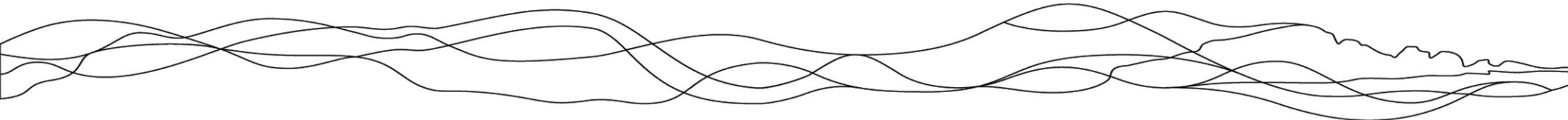
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		<p>The Community Land trust model of housing delivery is not relatively untested. The issue is finding suitable, deliverable sites with willing land owners.</p>	
40	Policy H1: residential development in the open countryside	<p>1st paragraph – ‘Generally residential development’ The use of the word “generally” does not provide any certainty and is unnecessary considering the subsequent criteria that would be applied to any application.</p> <p>2nd paragraph - This paragraph does not fill well within a policy. It is unclear what the message is and it would not be possible to use such requirements in the assessment of a planning application.</p> <p>Bullet points - The RRNDP sits within the context of national and local planning policies. As currently drafted, policy H1 re-emphasises much of the protection already afforded by national policy and emerging Local Plan policy SD22: Development Strategy. This additional layer may be unnecessary, risks creating significant confusion and may in places be in conflict with higher level policy, thereby undermining the level of protection afforded.</p> <p>2nd bullet point refers to sites being adjacent to an existing settlement boundary. Rake does not have a settlement boundary, so the policy as worded would only allow for an exception site on the edge of Rogate village. Is this the intention?</p>	Reconsider and reword policy.
41	Policy H2: Meeting the housing	Neighbourhood Development Plans, once adopted are ultimately used by applicants, development management officers and planning inspectors to make decisions on planning applications and appeals. Draft policy H2,	Reconsider and remove or reword policy.

Page number	Section	Comments	SDNPA Recommendation
	needs of the Plan area	<p>as currently drafted is not fit for this purpose. National policy contained within the NPPF paragraph 17 is very clear that Plans should “provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency.”</p> <p>It is not clear whether the first 2 paragraphs of this section are intended to be policy or an explanation of the decision of the Neighbourhood Planning Group not to seek to allocate land for development. The 1st paragraph sets out that the requirement for the Plan area will be met by sites allocated by the SDNPA. This is not policy in itself. The second paragraph indicates additional residential development will be supported if it meets an identified requirement. It is not clear where this requirement will be defined.</p>	
42	Policy H3: Extensions, replacement dwellings and Granny annexes	<p>1st bullet – wording such as ‘with an eye on...’ do not provide clarity for the applicant or the decision maker and need to be reconsidered.</p> <p>The RRNDP sits within the context of national and local planning policies. As currently drafted, policy H3 re-emphasises many of the issues addressed in the emerging Local Plan policy SD45: Replacement Dwellings and Extensions. This additional layer may be unnecessary, risks creating confusion and may in places be in conflict with higher level policy, thereby undermining the level of protection afforded</p>	Reconsider and reword policy.
42	Policy H4: Conversion of existing residential	<p>4th bullet – it is questionable that it would be possible to prove that a conversion meets an identified local need (as reviewed dynamically.....). Is it for the applicant to demonstrate this need or for the Parish Council / SDNPA?</p>	Reconsider and reword policy.

Page number	Section	Comments	SDNPA Recommendation
	properties		
43	Policy H6: New building	<p>“New buildings will be inappropriate in these locations.....” Where are these locations? It is also unclear as to how the Local Green Spaces relate to this policy.</p> <p>The NPPF states that local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. It continues to state that Local Green Space designations will not be appropriate for most green areas or open space. The designation should only be used:</p> <ul style="list-style-type: none"> • where the green space is in reasonably close proximity to the community it serves; • where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • where the green area concerned is local in character and is not an extensive tract of land. <p>The purpose of this policy as currently written is confused and may overlap with some of the aims of other policies in the plan. Furthermore, there seems limited justification for the requirement for</p>	Reconsider and reword policy.

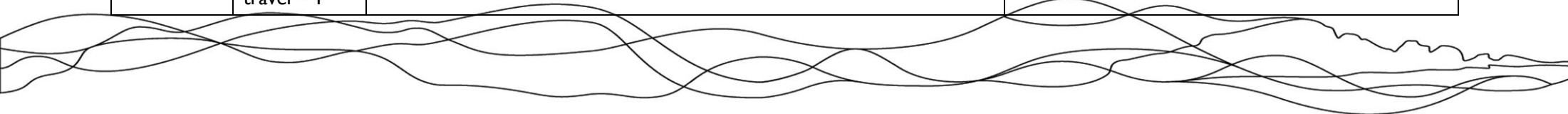


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		<p>replacement buildings not to be materially larger. South Downs Local Plan emerging policy SD45 states replacement dwellings should not result in the loss of a small dwelling (defined as having a total floorspace of 100m² or less).</p>	
43	Discussion on certain key Parish sites	<p>The role and purpose of this section is unclear and inconsistent with the purposes of preparing a Neighbourhood Development Plan.</p> <p>The RRNDP defers the decision on allocating sites to the SDNPA through the Local Plan. Albeit that this is accepted... by the SDNPA, the subsequent setting out of a series of sites, which are considered unsuitable, within the NDP is inappropriate. The SDNPA accepts that there are community concerns about the sites potentially available for development within the Parish but as a consequence of the RRNDP returning those decisions to the National Park it must also be accepted that it will be for the Authority to make these difficult decisions and that it is unlikely that there will ever be a circumstance where full community support is received for an allocation of land for development. Albeit that consultation responses form a key part of the preparation of a Local or Neighbourhood Plan, these need to be supplemented by evidence. The conclusion that development at Parsonage Estate and Hugo Platt is inappropriate needs to be backed by further information. Is the road access inappropriate? Is there no land available? Why exactly do people not wish to see development in this location? A simple 'no' to development is insufficient to provide any guidance to either yourselves or the SDNPA. The National Park would therefore object should this section remain within the RRNDP as it attempts to tie our</p>	<p>This section should be removed from the Plan and placed in a supporting or separate document as evidence of the communities views which could be used to inform any comments made by the Parish Council at a later date on the SDNPA emerging Local Plan.</p>



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		<p>ability to take a fresh and objective look at the options available.</p> <p>In addition to this overarching comment there are some inaccuracies in the information presented. These are:</p> <ul style="list-style-type: none"> • The NDP process has concluded that Parsonage Estate / Hugo Platt is inappropriate but later it is stated that it is not the intention to discourage additional affordable housing. These statements are incompatible. • I-4 Parsonage, again it is stated that it is inappropriate but then suggests that single storey homes may be suitable should development take place. • I – 4 Parsonage – reference to full and transparent consultation. What does this mean and when should it take place and how would this differ from the consultation that would take place should a planning application be submitted? • I – 4 Parsonage does not have an unimplemented planning application on it, no decision notice was ever issued and it has now been disposed of so a new application would be required. • I-4 Parsonage - It should be noted that this site is within the settlement boundary • Garage units – it should be noted that this site is within the settlement boundary • Garage units – access for fuel/biomass delivery vehicles would 	

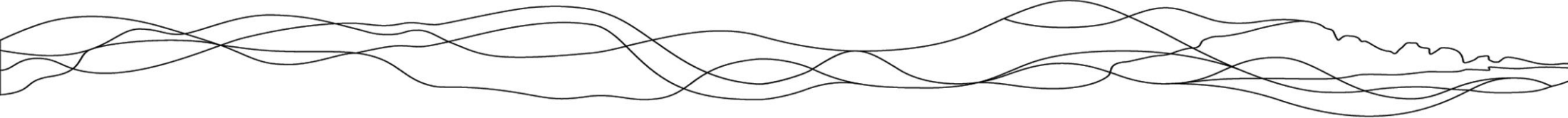
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		<p>suggest that this may not be a suitable site for a district heating plant, neither are the number of properties likely to be served sufficient in number.</p> <ul style="list-style-type: none"> • Clayton Court – it is noted that the provision of community facilities would be sought on site. However, this is in a fairly isolated location and it has to be questionable what community facilities would be appropriate or sustainable. In addition the availability of the site is questioned as it would appear to be a registered provider of accommodation and care for elderly people (Brothers of the De La Salle teaching order of monks). • Renault Garage – information on the availability of this site is required. It is currently in active use. • Renault Garage – it should be noted that this site is within the settlement boundary 	
49	Policy EW1: Supporting the rural economy	<p>Land formerly used for agricultural purposes does not fall within the definition of previously development land.</p> <p>It needs to be recognised that many of the changes of use seen are as a result of permitted development rights over which the planning system has no control.</p>	Clarify wording
51	Policy T1: Encouraging sustainable travel – 1 st	<p>It is suggested that improvements to the existing network could be sought as well.</p>	Consider including “and enhance” after “exploit”



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	paragraph		
51	Policy T2: Parking	Emerging South Downs Local Plan policy SD44 also covers the provision of parking.	Consider need for policy T2. What does it add?
52	5.9 Energy	Should this section be included if there is no accompanying policy? Alternatively, given the community aspirations, could there be a policy that supports local renewable energy projects/district heating?	Consider an energy policy
53	Policy CH1: Assets of community value	See previous comments on Assets of Community value (page 27)	
54	Policy CH2: Retention of existing community facilities	<p>There is a need to re-examine the wording of the policy which requires that all of the criteria are met. This would mean that even if there was a lack of demonstrable need for the use, an applicant would also have to demonstrate that alternative provision is available. This would clearly not be possible. It may also be difficult for any applicant to demonstrate that the alternative provision is accessible by sustainable means of transport, given the lack of such provision in the Rogate area.</p> <p>We would query whether all the facilities identified in policy CH2 are indeed community facilities as the list includes SSSI's and woodland. It would be extremely unusual for redevelopment of such sites to be considered in the first place and the provision of an alternative would in most cases be unacceptable. You cannot provide an alternative to a SSSI for example.</p>	Reconsider table CH2 so that it more appropriately relates to policy CH2. Reconsider and reword policy.

Page number	Section	Comments	SDNPA Recommendation
55	Policy CH3: Local Green Space	Experience at the recent Petersfield NDP Examination highlights the need to evidence how these sites have been selected and justify how they meet the requirements as set out in the NPPF paragraph 77. What do they add to the existing level of protection? How are they demonstrably special?	Provide further evidence in support of proposal.
57	Section 6.0	There is no guidance available at present on how a NDP might be reviewed and what the requirements will be. It is therefore suggested that the second half of the section starting, 'Unlike the higher level local plan....' be removed or the level of detail reduced so that the Parish Council does not become tied to a certain course of action in the future.	Remove wording or reduce level of detail.
59 – 60	Projects	<p>Planning obligations under Section 106 of the Town and Country Planning Act 1990 (as amended), commonly known as s106 agreements, are a mechanism which make a development proposal acceptable in planning terms, that would not otherwise be acceptable. They are focused on site specific mitigation of the impact of development.</p> <p>The Community Infrastructure Levy (CIL) is a contribution towards the infrastructure needed to support the development of the area. It is a charge per square metre of floorspace and is due to be implemented shortly in the SDNP.</p> <p>CIL can be used to help pay for infrastructure needed to support new development, but not to remedy existing deficiencies unless the new scheme will make it worse.</p> <p>The purposes of S106 and CIL need to be borne in mind when looking</p>	Reconsider the suggested sources of funding.

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		at funding sources.	



In addition the following comments have been received from officers at **Chichester District Council**

Conservation and Design

The approach to the Historic Environment appears to be a bit fragmented. There appears to be no mention of archaeology in the document. Also the only reference to listed buildings, apart from the Appendices, is in the introductory text for the “Built Environment” and there doesn’t appear to be a policy to support the statement that the Plan will “seek to reinforce the guidance included in higher level policy that they (listed buildings) should be protected and maintained”. Most of the information on the historic environment is in the Appendices which are lengthy and possibly difficult to navigate and reference.

We recommend that there should be some mention of archaeology, either independently or as part of a generic historic environment section that includes it with the built heritage. It should certainly not be an anonymous part of ‘heritage’ under 5.3 ‘Management of the Natural Environment’. And there should be some mention of non-designated heritage assets. We recommend the inclusion of an historic environment policy “Conserving and Enhancing the Historic Environment.” Possibly as a second Environmental Management policy, or combined with Policy BE2: Conservation Areas and this should include reference to both designated and un-designated heritage assets and also set out requirements for new development to respect their settings.

The Design Policy and section could include a reference to relationships between buildings and buildings and spaces, locally distinctive materials and detailing which are all an important facet contributing to local character. It is noted that there is reference to materials and in the Appendices – but as stated above they are lengthy and possibly difficult to reference.

Rogate and Rake Parish Council could consider the preparation of a Village Design Statement as a supporting document which could include some guidance. There appear to be a number of different parts of the Appendices relating to Design Guidance and maybe these could be consolidated into a separate stand-alone document combined with the VDS.

Community Team

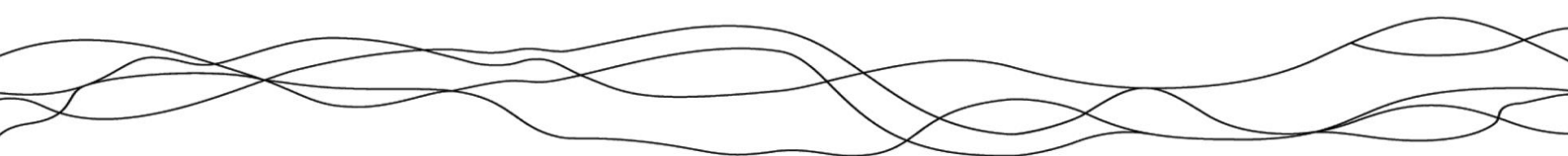
The document is considered to be fine but quite broad, general and a little repetitive but it is good to see mention of the possibility of a community hub and the suggestion that one of the identified sites (5.6.2 Garage units on Parsonage site) could be redeveloped for other uses including a meeting place and open space, not just housing.

It states that central to the aims of the Plan, is its ability to identify local amenity and recreation needs, safeguard facilities already in place, promote the provision of additional facilities in the future and has 3 policies in which to do this:

5.10.1 Policy CHI Assets of Community Value

5.10.3 Community Infrastructure – (no policy reference in the title and 5.10.2 seems to be missing although ‘CH2’ is mentioned in the table caption)

5.10.4 Policy CH3 Local Green space



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It does not go into any great depth as to the condition, usage or future needs of existing facilities specifically the village halls although it does mention car parking issues caused by the usage of the village halls.

(Page 25) 2.8.3 car parking – this has identified that at peak times, car parking is an issue at the village halls (along with Rogate school) and have Policy 5.8.2 T2 Parking – this supports proposals for additional areas of off street parking for use by visitors to the Village Hall which is good.

It has listed the community facilities which is also good

(Page 27) 3.10.1 – lists ‘Community Facilities’ identified within Rogate and Rake, including the village halls and proposes to secure the future of many of these facilities through their inclusion on the Community Assets Register and that the Parish Council should give significant priority to safeguarding and supporting the existing village amenities. This list also appears (page 55) 5.10.3 as ‘Community infrastructure’. Are they not the same thing? Should they have the same heading etc?

Referring to the Community Assets Register in the paragraph after the list of 3.10.1 Community facilities (page 28), the Plan states that the Parish Council will work with the SDNPA to secure the future of many of these facilities through their inclusion on the local Community Assets Register. The Community Assets Register is actually held by CDC, not the SDNPA. Are all the community facilities included on this list and what if the community facility is not on the Community Assets Register? What happens to it then?

(page 30) 4.0 Vision and objectives – 8. Only states to enhance the accessibility of the local countryside public open space, public footpaths and bridleway, outdoor and indoor recreational facilities etc. This does not mention maintenance, improvement or provision of new, only access.

Page 39 states ‘that new development in the Parish is likely to be in blocks of less than 5 units (which therefore attracts no CIL or Section 106 benefits to the Parish,’

Incidentally, there is no closing bracket but, more importantly, all new market homes are subject to CIL and the charge will be based on internal floor space so small developments, even of less than 5 units, will generate CIL contributions and should therefore provide benefit to the Parish. However, if you leave this sentence as it is, in 7.0 ACTION PLAN, the tables of identified actions with ‘what’, ‘how’, ‘who’ and ‘funding’, the ‘funding’ columns quote CIL and S106 as funding sources which could appear as a contradiction if the Plan has already stated that they will not be receiving any. Therefore maybe the sentence should be changed to attract a small amount of CIL.

Housing

The plan indicates there is support and need for additional affordable housing within the parish. However the plan does not address how these will be delivered. It is advised that 5.6 of the plan are removed and maybe submit them as supporting evidence, as some of the comments contradict the policies which make the plan confusing to understand.

Page 22, 3.6 Housing (paragraph 7)

The text acknowledges that of the 11-25 units to be delivered over the period plan, 50% should be delivered as affordable. It is unclear how this will be achieved. Currently CDC’s interim statement on planning for affordable housing requires 40% to be delivered as affordable on sites of 10+ units and 20% on 5-9 unit sites. The interim statement will be used until SDNP adopt their Local Development

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Plan. At present it is unclear what affordable housing thresholds the park will adopt, therefore it is advised that an explanation of how this will be achieved should be included or it should be removed to remain consistent with whatever stance the National Park take.

Page 43, 5.6.1 1-4 Parsonage

It is unclear if the supplementary questionnaire was only delivered to Parsonage and Hugo Platt residents. If this is the case, the responses only represent the views of 7.5% of the parish population. It must be noted that these respondents were supportive of more affordable housing within the parish.

Page 46, 5.6.2 Garage units on Parsonage site, Rogate

This site is owned by one of CDC's preferred registered providers. They are looking to redevelop the site to provide 2 x 1 bedroom bungalows and 2 x 2 bedroom houses as affordable rent having received parish council support in November 2012 for redeveloping the site.

This is a brownfield site within the SPA, which would deliver 4 affordable units to meet local housing need. The comment that this site is "inappropriate for any development" contradicts Policy H1.

Page 46, 5.6.3 Clayton Court, fronting B2070 at Hill Brow NP-03

Is this site currently a nursing home as it is unclear to the exact location? If this is the nursing home site, will this be re-located elsewhere?

The area of this site is located outside of the SPA on the NW edge of the parish and if developed would contradict policy H1.

