

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

REPRESENTATION TO THE FINDON NEIGHBOURHOOD PLAN SUBMISSION CONSULTATION

On behalf of MLN (Land and Properties) Limited

Document Reference: MLN1/28/Findon/NPRep

Date: 15 April 2016

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1. INTRODUCTION

- 1.1 This representation to the Findon Neighbourhood Plan Submission Consultation is submitted on behalf of MLN (Land and Properties) Limited who have an interest in Land in Findon.
- 1.2 This representation is submitted in response to the Regulation 15 consultation, and in particular will focus on the housing policies of the plan.
- 1.3 This representation will examine whether or not the plan meets the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) and as applied to neighbourhood plans by section 38A of the 2004 Planning and Compulsory Purchase Act.
- 1.4 The independent Examiner is required under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended), is required to determine whether:
 - (a) the policies in the Plan relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;
 - (b) the Plan meets the requirements of Section 38B of the 2004 PCPA where the plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area; and
 - (c) that the Plan has been prepared for an area that has been designated under the Localism Act 2011 and has been developed and submitted for examination by a qualifying body.
- 1.5 The Examiner is obliged to determine whether the Neighbourhood Plan complies with the Basic Conditions. These are that the Plan is required to:
 - (a) have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - (b) contribute to the achievement of sustainable development;
 - (c) be in general conformity with the strategic policies contained in the Development Plan for the area; and
 - (d) not breach, and is otherwise compatible with, EU obligations and human rights requirements.

2. STRATEGIC CONTEXT

- 2.1 *The National Planning Policy Framework 2012* (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The *Planning Practice Guidance* provides Government guidance on planning policy.
- 2.2 The adopted development plan for the area comprises the saved policies of the Arun District Local Plan 2003. The saved strategic policies of the Arun District Local Plan include policies relating to countryside, housing, settlement boundaries and strategic and local gaps although the Plan covered a period up to 2011.
- 2.3 The South Downs National Park was first designated as an Area of Outstanding Natural Beauty (AONB) before being designated as a National Park on 1st April 2011. The South Downs National Park Authority (SDNPA), then became the body with the statutory responsibility of writing Planning Policy for the National Park Area on the 1st of April 2011.
- 2.4 Prior to the National Park designation, Arun District Council had responsibility for making planning policy and planning decisions for development in the Findon Parish. The emerging Arun District Local Plan is currently subject to examination. The emerging Arun District Local Plan will exclude areas that fall within the South Downs National Park (including Findon). As such, the extant adopted development plan policies for Arun will cease to become operative once the emerging Arun Local Plan becomes adopted. This would have the effect of leaving a strategic policy vacuum for Findon (and other areas covered by the extant Arun Local Plan) that fall within the National Park until the emerging South Downs Local Plan is adopted.
- 2.5 SDNPA are currently in the process of preparing their own Local Plan, however until such time that the SDNPA Local Plan is adopted, the saved policies of the Arun District Local Plan (2003) provide the Development Plan Framework for planning decisions in the Findon Parish, subject to their consistency with the NPPF.

Arun District Local Plan “Saved” Policies (2003)

- 2.6 The assessment below provides an overview of the saved Arun District Local Plan 2003 policies.

The Proposals Map

- 2.7 The Local Plan proposals map shows Findon as being located within an AONB, which has now been superseded by its National Park Designation. Findon is then shown as having a built up area boundary. No housing allocations are shown within Findon on the proposals map which demonstrates that no plan-led housing allocations have been delivered in Findon over the past 13 years, although some infill plots would undoubtedly have been developed within the settlement boundary over this period.
- 2.8 To the south of the settlement, a Strategic and Local Policy Area has been identified. This area is identified as a “Local Gap” where development will only be permitted if:

- (a) it is demonstrated to be necessary to meet the requirements of, or is consistent with, other policies of the Development Plan; and
- (b) either individually or cumulatively it does not contribute to the coalescence of settlements; and
- (c) attention is given to the long term enhancement of the landscape, amenity and conservation value within the gap and, where possible, to the improvement of public access.

Relevant Saved Policies for Housing in Findon

GEN2

The boundaries of the built-up area for the purposes of the West Sussex County Structure Plan and this District Local Plan are defined on the Proposals Map. Development or redevelopment will be permitted within the built-up area boundaries, subject to the other policies in this plan. Outside the built-up area boundaries, development or redevelopment will not be permitted unless it is consistent with other Local Plan policies.

GEN3

Outside the Built-Up Area, as defined on the Proposals Map, the countryside will be safeguarded for its own sake. Development will not be permitted unless:

- (i) it meets the operational needs of agriculture, forestry, the extraction of minerals or the deposit of waste; or
- (ii) for quiet, informal recreation; or
- (iii) for the diversification of the rural economy; or
- (iv) for essential road schemes; or
- (v) it is in accordance with a policy in Sections 2 and 3 of the plan referring to a specific use or type of development.

Permission will not be given for the extension of isolated groups of buildings or the consolidation of linear or sporadic development unless the proposal accords with criteria (i) to (iii) or (v).

GEN5

The Plan makes provision for 8,700 new dwellings to be built within the District during the period covered by the Plan (1996 - 2011).

AREA11

Local Gaps, as identified on the Proposals Map will be protected and maintained between:

- (i) Findon and Worthing
- (ii) Angmering and Rustington/East Preston

- (iii) Felpham and Bognor Regis
- (iv) Walberton and Barnham
- (v) Eastergate and Barnham

Development in the Local Gaps will only be permitted if:

- (i) it is demonstrated to be necessary to meet the requirements of, or is consistent with, other policies of the Development Plan; and
- (ii) either individually or cumulatively it does not contribute to the coalescence of settlements; and
- (iii) attention is given to the long term enhancement of the landscape, amenity and conservation value within the gap and, where possible, to the improvement of public access.

DEV17

Within allocated and unidentified housing developments of 25 or more dwellings or residential sites of 0.8 hectare or more, irrespective of the number of dwellings, the Local Planning Authority will seek to secure the provision of affordable housing.

The appropriate level and type of provision will be dependent upon identified local housing need, character of the area, suitability of the site and market conditions at the time of the submission of the relevant planning application.

Where sites are considered suitable for affordable housing but other factors demonstrate that on-site provision is not appropriate, the Local Planning Authority will seek direct provision on another site or, in exceptional circumstances, accept a payment in lieu of provision.

For the purposes of the Local Plan, affordable housing comprises both social and low cost market housing. The provisions made for social housing should ensure that appropriate arrangements are in place to ensure that it is provided, in perpetuity, to those in housing need in the District. This will usually be in conjunction with a Registered Social Landlord. The Local Planning Authority will use either planning conditions or obligations to ensure provision of the agreed social housing element as part of the overall development.

The provisions made for low cost market housing should ensure that it will be available to people who cannot afford to rent or buy houses generally available on the open market.

DEV18

Proposals for affordable housing will be permitted on sites in the rural area, provided that:

- (i) there are no other policy constraints upon development except the location of the site outside the built-up area;
- (ii) the Local Planning Authority is satisfied that a need exists in the locality for affordable housing;
- (iii) the development meets the needs of:

- (a) the existing residents of a particular parish, requiring separate accommodation, or
- (b) people who are not necessarily resident locally but who have long-standing links with the local community, or
- (c) people with the offer of a job in the locality, who cannot take up the offer because of lack of affordable housing;
- (iv) the site is well related to the existing settlement;
- (v) the development does not contain any element of private housing for sale or rent on the open market.

Permission granted in these cases will be subject to a legal agreement which includes safeguards that the scheme provides for the identified local need and will continue to do so in the long term.

Emerging South Downs National Park Local Plan

- 2.9 The SDNPA are currently in the process of preparing a new Local Plan for the area. A draft Local Plan “Preferred Options” plan was approved by Members on 16 July 2015 and was subject to consultation between 2 September and 28 October 2015. The SDNPA anticipates having an adopted in place during 2017.
- 2.10 The emerging Local Plan will shape growth and new development up to 2032.
- 2.11 The preferred options local plan contained the following relevant policies as summarised in the paragraphs below.

Core Policy SD1: Sustainable Development in the South Downs National Park

1. When considering development proposals the Authority will take a positive approach that reflects the presumption in favour of sustainable development provided that they:

- a) are consistent with the National Park purposes;
- b) pay due regard to the duty in pursuit of the purposes;
- c) conserve and enhance the special qualities of the National Park;
- and
- d) comply with all the relevant policies within this Local Plan.

2. If there is a conflict between the purposes, greater weight will be given to the first purpose.

3. The Authority will work with applicants to find solutions to ensure that development proposals that are in accordance with the policies in this Local Plan can be approved without delay, unless material considerations indicate otherwise.

Core Policy SD3: Major Development in the South Downs National Park

1. In determining what constitutes major development the SDNPA will consider whether the development, by reason of its scale, character or nature, has the potential to have an unacceptable adverse impact on the natural beauty, wildlife or cultural heritage of, or opportunities for quiet recreation provided by, the National Park. The potential for adverse impact on the National Park will be dependent on the individual characteristics of each proposal and its context.

2. Major Development will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest. In assessing development proposals, consideration will be given to:

- a) the proven need for the development, including in terms of any national considerations;
- b) the impact of permitting it, or refusing it, upon the local economy;
- c) the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way;
- d) any detrimental effect on the environment, the landscape and quiet recreation, and the extent to which that could be moderated; and
- e) any detrimental effect on the special qualities of the National Park and whether they can be mitigated.

Core Policy SD4/ DS: The Dip Slope

1. Development proposals in the Dip Slope that comply with this Policy and the Development Strategy (SD22), will be supported provided that they comply with other relevant policies in this Local Plan.

2. Moderate-scale growth, which is proportionate to the size of settlements and the landscape's capacity to accommodate further development, will be delivered in settlements identified in Policy SD22 (Development Strategy).

3. Any growth in the Dip Slope should, as appropriate, deliver multiple benefits through ecosystem services. These may include provisioning services such as viticulture and regulating services such as water management.

4. Development will be guided by the South Downs Integrated Landscape Character Assessment and Built Environment Characterisation Study, in compliance with Policy SD5 (Landscape Character) and Policy SD6 (Design), by taking into account the management and development considerations for the landscape types in this area.

Strategic Policy SD22: Development Strategy

- 2.12 Part 1 of Policy SD22 identifies settlements that will have defined settlement boundaries. Findon is one of the settlements listed. The supporting text to the policy confirms that the SDNPA will work with neighbourhood planning groups on reviewing their settlement boundaries, which will include Findon. The remaining parts of Policy SD22 are as follows:

2. The principle of development within the settlement policy boundaries as defined on the Policies Map will be supported provided that it complies with the other relevant policies, is of a scale and nature appropriate to the character and function of the settlement and is in compliance with the policy for the relevant Broad Area (policies SD4/CP Coastal Plain, SD4/DS Dip Slope, SD4/WD Western Downs, SD4/SS Scarp Slope and SD4/WW Western Weald).

3. Development proposals will **not** normally be permitted outside of settlement boundaries and the countryside will be protected in accordance with relevant policies in the Local Plan and national policy. In exceptional circumstances, development in the open countryside will be permitted, where it is demonstrated to the satisfaction of the Authority that it is in accordance with the policy for the relevant Broad Area (policies SD4/CP Coastal Plain, SD4/DS Dip Slope, SD4/WD Western Downs, SD4/SS Scarp Slope and SD4/WW Western Weald), and:

- a) It is in accordance with Policy SD25 on rural exception sites, or
- b) It is in accordance with Policy SD27 on Sustaining the rural economy, or
- c) There is an essential need for a countryside location, or
- d) It is an appropriate reuse or redevelopment of an existing building(s).

4. Development proposals within estates and large farms that support appropriate diversification, which may not otherwise be considered acceptable outside of settlement boundaries, may be exceptionally considered suitable providing that they clearly meet the following criteria to the satisfaction of the Authority:

- a) The development proposals comply with other relevant policies and are part of a comprehensive Estate or Farm Plan that conserves and enhances the landscape; and
- b) The development proposals as part of an estate or farm plan deliver multiple benefits in line with the Purposes and Duty and the special qualities of the National Park and in regard to ecosystem services.

5. Small sites with the potential for development that are located within the National Park, but on the edge of settlements which are outside of the National Park, will only be allocated for development where they comply with other relevant policies.

6. The efficient and effective re-use of previously developed land will be encouraged, where appropriate, and in compliance with other relevant policies.

Strategic Policy SD23: Housing

1. In accordance with Policy SD24 (Affordable Housing), the SDNPA will aim to deliver approximately 1,840 affordable homes between 2014 and 2032.

2. The SDNPA will make overall provision for approximately 4,596 net additional homes between 2014 and 2032.

3. These will be delivered through:

- (i) the development of strategic sites and the allocation of land for housing in the Local Plan and neighbourhood plans;
- (ii) the implementation of planning permissions; and
- (iii) the development of land previously unallocated or identified (windfall), in accordance with Policy SD22 (Development Strategy) and subject to relevant policies in this Local Plan.

4. The allocation of sites to accommodate approximately the following levels of housing in addition to extant planning permissions and windfalls:

Findon – 20

(the policy lists housing requirements for all other settlements, however only Findon is listed above for ease of reference.

5. Development that meets an identified local housing need in settlements, in addition to the requirements set out above, is identified in neighbourhood plans and is in compliance with Policy SD22 (Development Strategy) and other relevant policies in this Local Plan will be supported.

6. The size and type of homes for each proposal will be based on up-to-date evidence of local needs. A suitable mix will be determined through liaison with parish or town councils, housing authorities and rural housing enablers where applicable.

3. NEIGHBOURHOOD PLAN POLICY ES1

- 3.1 Emerging NP policy ES1 states that new development within the Local Gap identified in the 2003 ADC Local Plan and shown in Map 2 will not be permitted.
- 3.2 Whilst the above policy proposal would be consistent with the adopted Arun District Local Plan, the emerging Arun District Local Plan will not cover this location once it is adopted, and policies in the emerging SDNP Plan will replace them.
- 3.3 The designation of local gaps or strategic gaps is a strategic matter and there are no emerging policies in the South Downs Local Plan that seek to make such designations.
- 3.4 In landscape terms, emerging policy SD5 seeks to conserve and enhance the landscape character of the National Park. Development proposals are required to be informed by the South Downs Integrated Landscape Character Assessment (SDILCA) (2011) and appropriate site based investigations.
- 3.5 The proposed Local Gap has not been robustly reviewed, and its relevance has not been supported or justified by a qualitative analysis or any other robust up to date assessment to measure the sensitivity or quality of the landscape, nor has an assessment been made regarding the contribution of any land parcel to maintaining a gap between settlements.
- 3.6 Furthermore, no extent of strategic gap is proposed to be designated in the emerging plan.
- 3.7 Without the evidence base required, this policy approach to designating a Local or Strategic Gap does not have regard to the NPPF. In particular, it does not have regard to paragraph 113 in the NPPF which requires distinction between the hierarchy of designated landscape areas, so that protection is commensurate with their status.
- 3.8 In order to meet the basic conditions, it is therefore recommended that this policy be deleted from the plan.

4. NEIGHBOURHOOD PLAN POLICY HD1

- 4.1 Emerging NP Policy HD1 states that development proposals of a minimum of 20 new dwellings, to meet the parish allocation set by the SDNP, will be supported provided that they are sited within the settlement boundary of the built up area as defined on the BUAB map.
- 4.2 Whilst the above policy would be in general conformity with the extant Arun Local Plan in terms of the defined settlement boundary, it is not considered that the proposal would be in conformity with the NPPF.
- 4.3 The NPPF sets policies to contribute to the achievement of sustainable development.
- 4.4 The policy as proposed in the NP would not contribute to the achievement of sustainable development.
- 4.5 The plan attached at **Appendix 1** shows all of the proposed designations and allocations of the NP on a Google Earth Plan and shows the settlement boundary, proposed Strategic Gap, Assets of Community Value, Local Green Space designations and other Local Open Space.
- 4.6 It is evident from the plan that very few opportunities exist to facilitate the development of 20 dwellings within the existing settlement boundary. Furthermore, the NP does not identify any potential housing sites within the settlement boundary where housing could go.
- 4.7 Very few opportunities exist for additional dwellings on existing garden land, and no opportunities to redevelop previously developed sites currently exist, given the predominantly residential character of the settlement.
- 4.8 The piecemeal development of single dwelling plots within the existing settlement boundary is unlikely to deliver the minimum number of 20 dwellings envisaged over the plan period, nor would the development of single plots achieve the delivery of affordable housing.
- 4.9 The South Downs SHLAA only identifies two potential sites that could facilitate additional residential development within the settlement boundary. These sites are given the reference AR020 and AR021. The SHLAA Extracts are attached at **Appendix 2**. These extracts show that the sites are occupied by existing dwellings and are covered in mature trees. The trees on site AR020 are subject to a TPO. The total yield of the two sites combined is estimated to be in the region of 13 dwellings, which would not meet the minimum requirement to provide 20 dwellings within the settlement boundary.
- 4.10 In line with Government Policy, the National Park seeks to focus housing policies on the delivery of affordable housing, although open market housing is allowed for in emerging Local Plan Policy SD23.
- 4.11 Emerging Local Plan Policy SD22 seeks to direct the most housing development to the most sustainable locations, taking into account the availability of suitable land, the services available, the need to sustain balanced communities, and the function of and relationship between settlements. Amongst most of the smaller settlements, Findon is identified as having

to deliver a minimum of 20 dwellings over the plan period, which recognises the fact that Findon has a good range of local services available, including public transport, a primary school, village hall, post office and local shops.

- 4.12 NP Policy HD1 seeks to deliver a minimum of 20 new dwellings within the existing settlement boundary. The attached plan at **Appendix 1** and the SHLAA extracts at **Appendix 2** demonstrates that this would not be possible as no large sites are available within the settlement boundary, and the delivery of 20 open market and/or affordable houses could not be realistically delivered on infill plots or through the development of residential garden land.
- 4.13 Policy SD24 will require the delivery of 40% affordable housing on sites of 6 or more dwellings, which for Findon, the two sites within the settlement boundary would amount to the delivery of just 6 affordable homes.
- 4.14 The Housing Need Survey for Findon commissioned in 2013, which forms part of the NP evidence base confirms that there are 24 households with a local connection who cannot afford to purchase or rent on the open market.
- 4.15 Whilst the proposed settlement boundary would be in accordance with the soon to be superseded Arun Local Plan, NP Policy HD1 would not contribute to the achievement of sustainable development, nor would it have regard to the NPPF in terms of housing numbers, the proposed restrictive settlement boundary, and the constraining effect it would have on the delivery of affordable housing to meet local needs.
- 4.16 National Planning Practice Guidance (NPPG) states that the NP must not constrain the delivery of important national policy objectives. Boosting significantly the supply of housing, including affordable housing and other types of housing is one such national policy objective. The tightly drawn settlement boundary proposed in the NP would clearly conflict with the national policy objectives of the NPPF. NP policy H1 would therefore not deliver the affordable housing sought in the emerging plan, would conflict with National Park objectives and would conflict with the social dimension of sustainable development. The policy therefore does not plan positively to support the local development required.
- 4.17 NP Policy HD1 therefore does not meet the basic conditions required by the legislation.

5. RECOMMENDATIONS

- 5.1 It is not considered that the NP as it currently stands would meet the basic conditions and therefore does not meet the statutory and legal requirements to proceed to a referendum.
- 5.2 It is therefore recommended that the plan be reviewed and modified to include a review of the settlement boundary, in addition to allocating a potential housing site(s) including, potentially reserve housing sites should the housing requirement figure for Findon change as a result of further review and examination of the emerging SDNP Local Plan. This would enable the architects of the Neighbourhood Plan to retain control over the choice of housing sites in the area, and in addition, should additional land be required, the Neighbourhood Plan would still exercise some control, albeit in a more positive way that would contribute to the achievement of sustainable development and positively address National Park objectives.
- 5.3 NPPG confirms that should there be a conflict between a policy in a neighbourhood plan and a policy in a Local Plan, Section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.
- 5.4 In this case, if the NP was to proceed in advance of the Local Plan, and the Local Plan subsequently adopted, then the Local Plan would take precedence over the Neighbourhood Plan where there is conflict. If the LP is adopted in 2017, then the NP is likely to be “out of date” not long after its adoption, which may render the current NP process to be pointless. It would certainly be the case that the NP does not support the strategic development needs of the emerging Local Plan and conflicts with National Park objectives.
- 5.5 It is evident from our submissions that the settlement boundary does need to be reviewed. Given that we do not consider that the NP as currently drafted meets the basic conditions, we consider that the NP should not proceed to referendum and that the plan is redrafted to both redraw the settlement boundary in consultation with the SDNPA, local residents and landowners and allocate suitable housing sites.
- 5.6 Should the Examiner agree with our conclusions, then Knights consider that a parcel of land to the south of Findon would be suitable and deliverable. The site in question has the capacity to deliver around 25 - 35 dwellings, which could be a mix of open market and affordable houses. The delivery of at least 25 dwellings on this site would enable a minimum of 10 affordable homes to be delivered to meet local needs. A plan showing the location of the site is attached at **Appendix 3**.
- 5.7 The site has sufficient road frontage to enable a safe and acceptable access to be provided. This has been confirmed by an assessment of the site by SCP Transport Consultants, who have also established that there is potential to deliver an improvement to the local highway network through the provision of an access to the site that would involve alterations to the junctions of Cross Lane and Nepcote Lane with the Findon Bypass.
- 5.8 Two draft access layouts produced by SCP are provided at **Appendix 4** and feature: Nepcote Lane being closed off at its junction with the Findon Bypass; and access to the site being

taken from Cross Lane, which would also provide a replacement route from Nepcote Lane to the Findon Bypass and vice versa. These access options would in turn improve the safety of this section of the Findon Bypass by replacing the two adjoining junctions with the bypass with a single junction and consequently reduce the risk of road accidents in this area.

- 5.9 Landscaping could be provided within the gap on the south side of the re-aligned Netcote Road to supplement the existing planting along the south site boundary that screens the site.
- 5.10 In terms of topography, the ground is gently sloping, and topography from either a delivery or landscape point of view would not be a constraint to development. The site is totally self-contained (which is plainly evident when undertaking a visit to the site - which we would encourage the Examiner, the Parish Council and LPA to do as part of their assessment of the site's development potential) and offers the potential for further landscape treatment such that any landscape impact of its development could be mitigated. Overall the site is considered to be a logical extension to and rounding off of the existing edge of the settlement, particularly given the strong/well defined existing boundary features that are present, as shown in the aerial images that accompany this submission at **Appendix 5**.
- 5.11 Furthermore we note that the LPA's comments on the draft NP (as contained in an officer report to the 14 April meeting of planning committee) include that the NP "departs significantly from the emerging South Downs Local Plan" and a number of concerns have been raised regarding Policy HD1 of the NP, including that:
- (a) Sites need to be allocated to allow for the delivery of approximately 20 homes (rather than relying on windfalls);
 - (b) This may require a change to the settlement boundary if sufficient sites cannot be found in the settlement; and
 - (c) The LPA will continue to consider allocating land in or around the village as insufficient evidence has been presented that land cannot be allocated without harm to the landscape character.
- 5.12 With the above in mind, we note that the LPA's 2014 SHLAA reaches similar conclusions about the potential impact of other potential sites on the edge of the settlement on the character and appearance of the landscape and assert that the subject site at Cross Lane/Nepcote Lane is a suitable site for allocation to meet the requirements of the emerging South Downs Local Plan - particularly given that it is a totally self-contained site with potential for further landscape treatment associated with its development as outlined above.
- 5.13 Otherwise there are no known constraints in terms of flood risk. The site is otherwise located in Flood Zone 1 (land assessed by the Environment Agency as having a less than 1 in 100 annual probability of river or sea flooding).

6. SUMMARY

- 6.1 The Neighbourhood Plan does not have regard to national policy in that it would constrain important policy objectives.
- 6.2 The emerging SDNP Local Plan is expected to be adopted in 2017, and therefore any conflict or tension between the two development plan documents would be resolved in favour of the Local Plan as the later Development Plan document to be adopted.
- 6.3 It is concluded that the Neighbourhood Plan as submitted does not meet the basic conditions, and should not proceed to a referendum.
- 6.4 In order to enable the plan to proceed to referendum and to enable the plan to meet the basic conditions, it is recommended that the settlement boundary be reviewed and suitable sites and a reserve site is allocated for housing in order to ensure that the plan would meet national and local policy objectives and to ensure that the plan would contribute to the achievement of sustainable development. A site to the south of Findon is put forward as a suitable site for allocation for residential development as part of this representation.
- 6.5 In the event that the Examiner considers it necessary to hold a hearing session to examine the Neighbourhood Plan, then Knights, on behalf of MLN (Land and Properties) Limited wish to attend the hearing session to explore the issues raised further.

Ben Weatherley BA (Hons), BTP, MRTPI
Partner

Alan Knott MTCP, MRTPI
Senior Planner

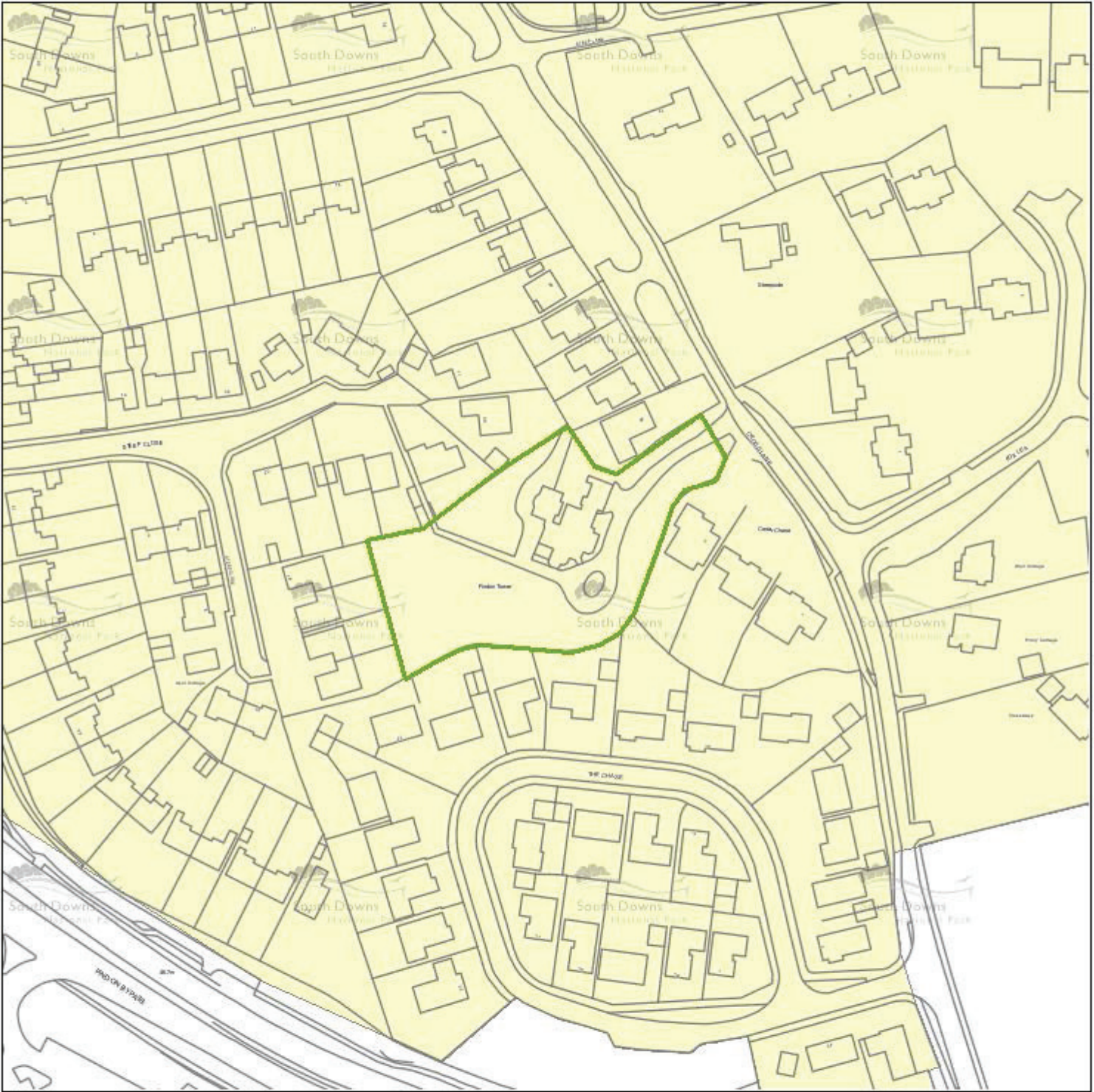
Knights Professional Services Limited
April 2016

APPENDIX 1



-  Proposed Neighbourhood Plan Settlement Boundary
-  Proposed Local Green Space Designations
-  Proposed areas of Local Open Space
-  Proposed Strategic and Local Gap
-  Proposed Allotment Land
-  Conservation Area
-  Asset of Community Value

APPENDIX 2



Key

Recommendation		South Downs National Park Boundary (where applicable)
Has Potential (Deliverable)		Settlement Boundary

Site Reference
AR020

Area

Arun

Site Address	Settlement
Findon Towers, Cross Lane	Findon
	Parish
	Findon

Source	Current Use
Previously assessed by Borough/District Council	Residential

Summary of Landscape Assessment
<p>Medium sensitivity</p> <p>Medium sensitivity due to existing trees and access having potential for impacts.</p>

Summary of Suitability	Is the site suitable?
The whole site is covered by group TPO which is expected to restrict development to the centre of the site, on and around the footprint of the existing dwelling. May be suitable for extension and conversion or redevelopment on and around the existing footprint.	Yes

Summary of Availability	Is the site available?
The site is considered to be available for development.	Yes

Summary of Achievability	Is development on the site achievable?
There is no reason to indicate why development on the site is not achievable.	Yes




Assessment Recommendation	Has Potential (Deliverable)
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Reason for Rejection
Not Applicable.

Site Area (Ha)	Site Density (dph)	Estimated Yield	0-5 years	6-10 years	11-15 years
0.4	15	6	6	0	0



Key

Recommendation		South Downs National Park Boundary (where applicable)
	Has Potential (Deliverable)	 Settlement Boundary

Site Reference
AR02I

Area

Arun

Site Address	Settlement
Well Cottage/Priory Cottage, Crossways, Cross Lane	Findon
	Parish
	Findon

Source	Current Use
Previously assessed by Borough/District Council	Residential

Summary of Landscape Assessment
Medium sensitivity Medium sensitivity due to existing trees and access having potential for impacts.

Summary of Suitability	Is the site suitable?
The site comprises of three large residential plots, surrounded by mature trees. The site is considered suitable for a small number of dwellings.	Yes

Summary of Availability	Is the site available?
The site is considered to be available for development.	Yes

Summary of Achievability	Is development on the site achievable?
There is no reason to indicate why development on the site is not achievable. However, a safe and appropriate access will need to be achieved.	Yes

Assessment Recommendation	Has Potential (Deliverable)
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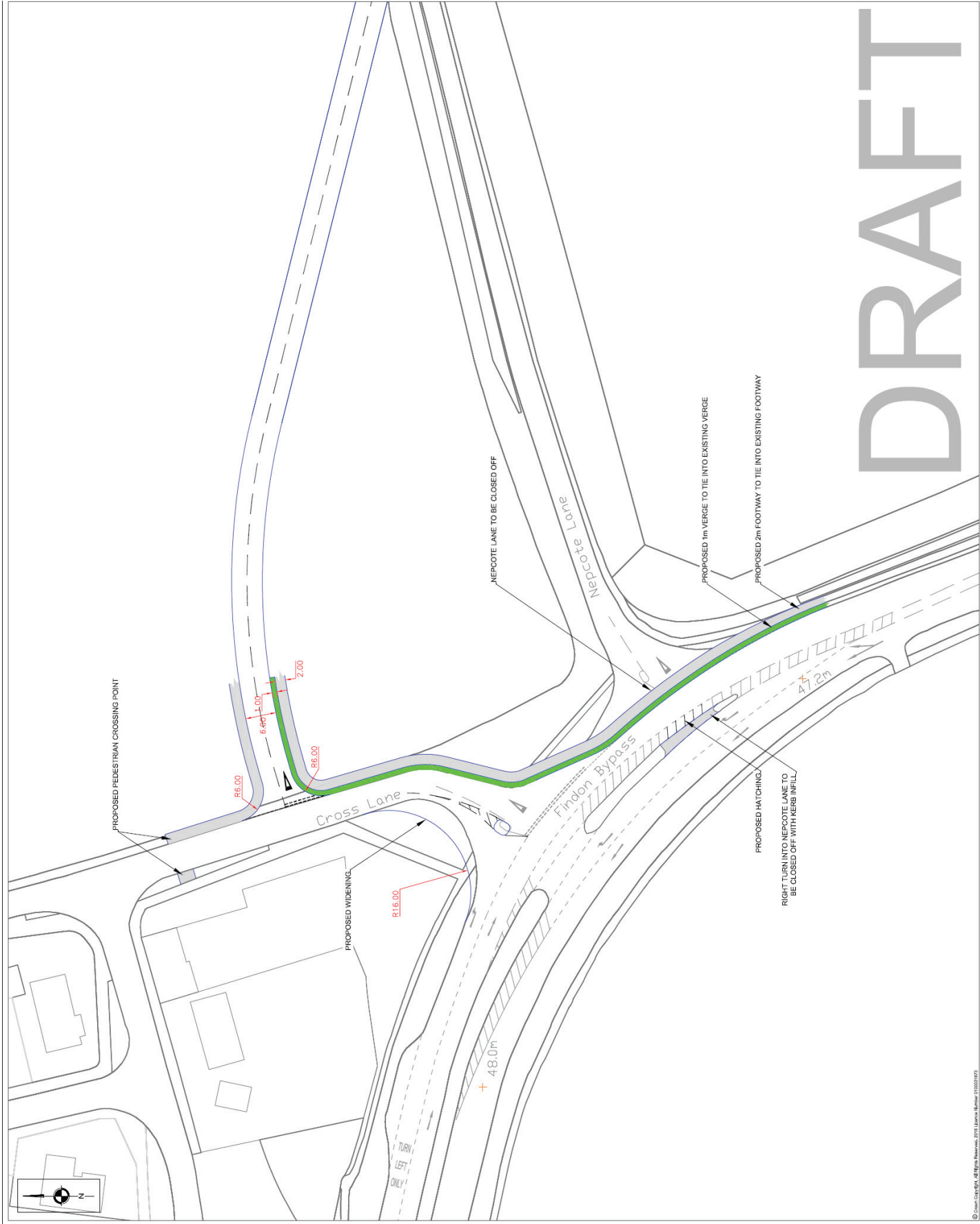
Reason for Rejection
Not Applicable.

Site Area (Ha)	Site Density (dph)	Estimated Yield	0-5 years	6-10 years	11-15 years
0.6	12	7	7	0	0

APPENDIX 3



APPENDIX 4



DRAFT

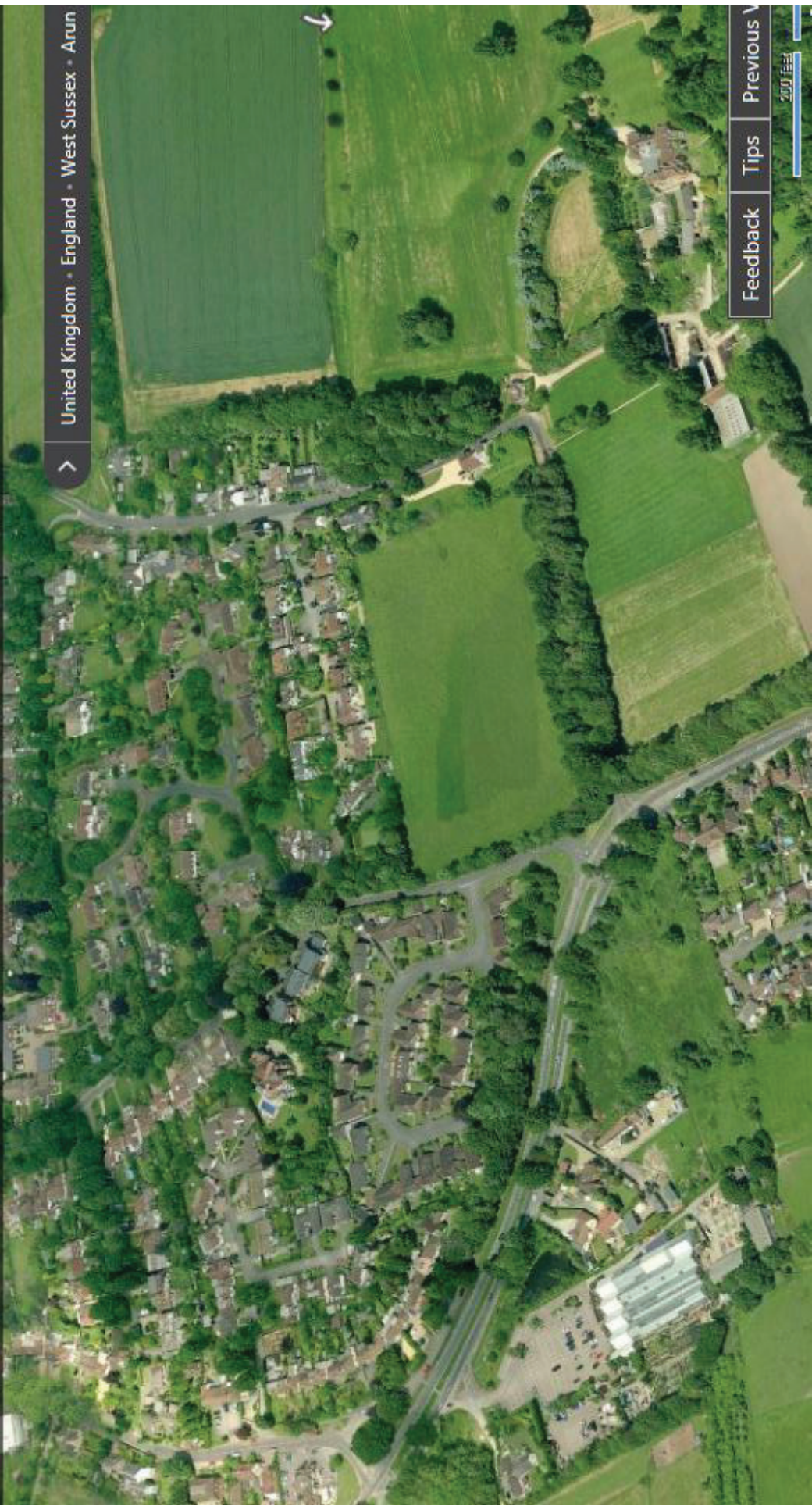


APPENDIX 5



A24
Finton, England

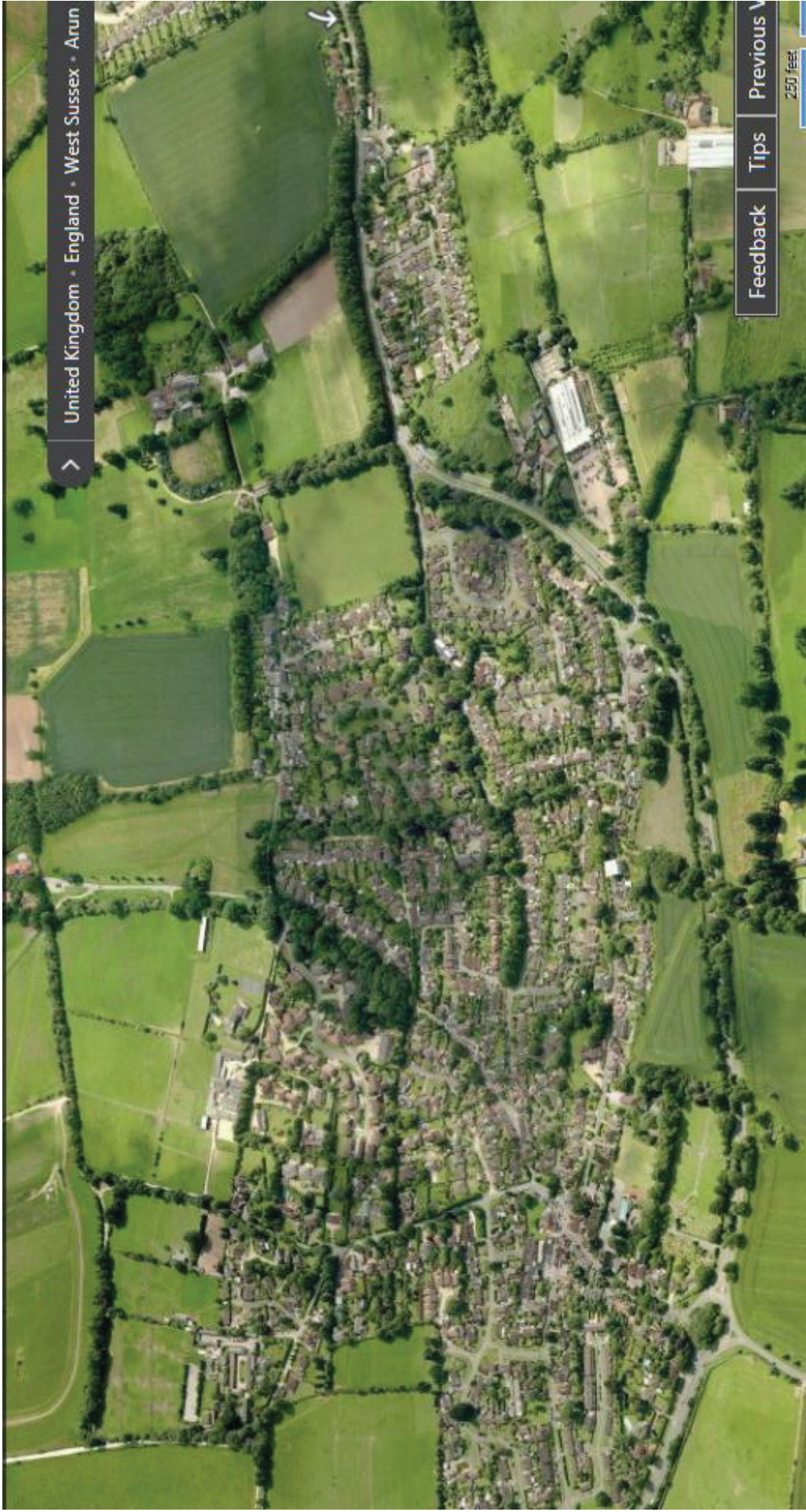
Street View - Jun 2014

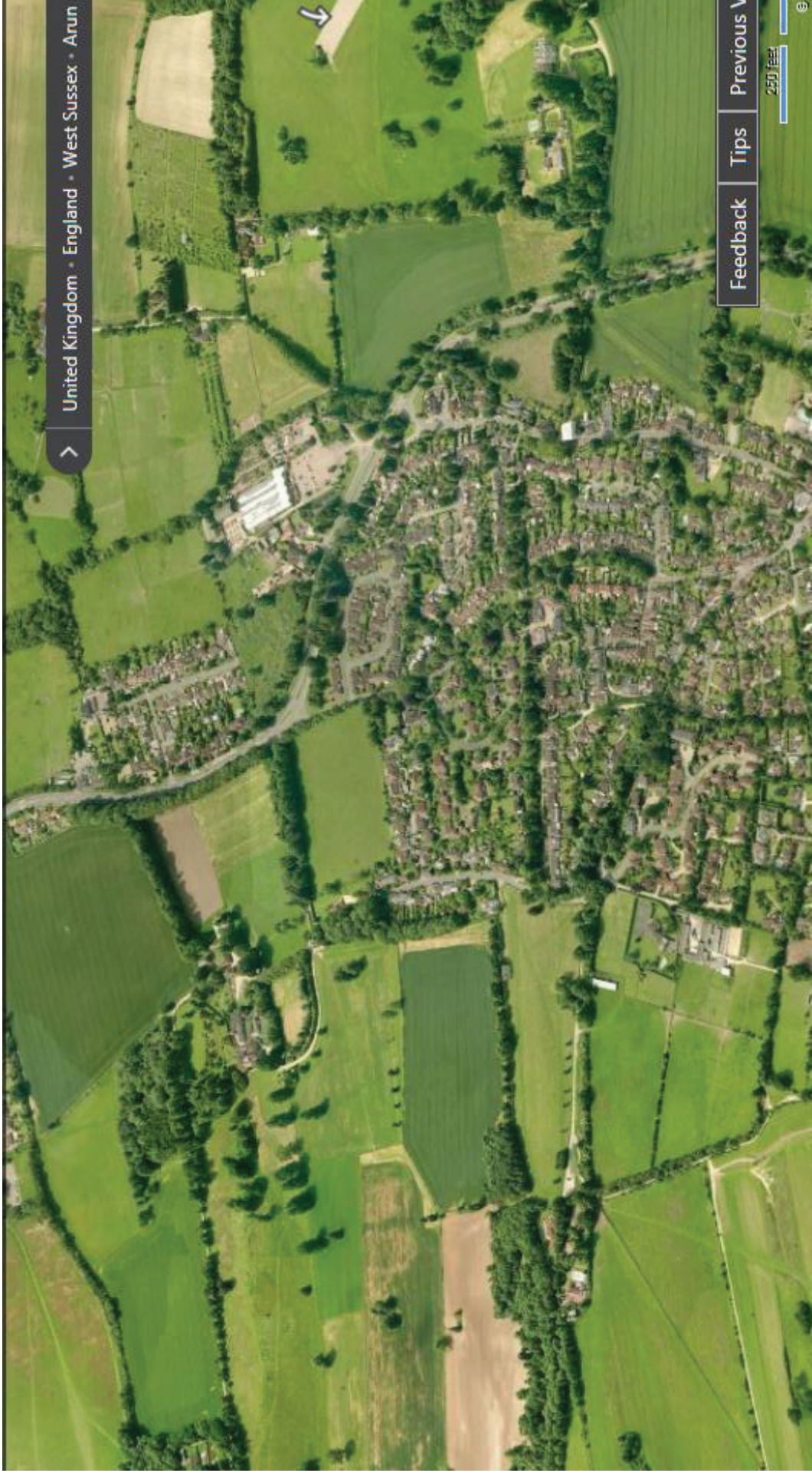


> United Kingdom • England • West Sussex • Arun

Feedback Tips Previous View

200 Feet





> United Kingdom • England • West Sussex • Arun

Feedback Tips Previous View

250 Feet



