

Ms Vicki Colwell
Major Planning Projects Officer,
SDNPA,
South Downs Centre,
North Street,
Midhurst,
Wessex Sussex GU29 9DH

26 May 2017

Dear Vicki,

Ref: Newton Valence Farm Whole Estate Plan (WEP)

Further to our recent phone calls, I am writing to you on behalf of Newton Valence Parish Council with our comments on the final draft of the Newton Valence Farm WEP.

As the representatives of the village and residents of Newton Valence, the Parish Council expects SDNPA to take due regard of the observations and comments when the WEP is reviewed internally and prior to any possible endorsement. As you will see we have separated the comments into two sections: General Observations and more detailed comments on the content of the draft.

Given the sheer scale of developments proposed which would seriously damage the character of the village, the significant reservations documented herein and conflicts with the SDNPA Local Plan, the Parish Council recommends that SDNPA does NOT endorse this version of the Newton Valence Farm WEP.

The Parish Council is ready and willing to provide further support or clarification that SDNPA requires and is willing to work with SDNPA and Newton Valence Farm to modify the WEP to make it more palatable to the village and residents.

Yours sincerely,

[Redacted]

Newton Valence Parish Council

cc:

[Redacted]

**NEWTON VALENCE PARISH COUNCIL COMMENTS ON
NEWTON VALENCE FARM WHOLE ESTATE PLAN
dated 19 May 2017 – Final Version**

GENERAL OBSERVATIONS

In addition to the detailed comments on the Newton Valence Estate WEP below, the Parish Council has a number of general major observations as follows:

1. The WEP contains numerous assertions, most of which are not supported or justified with any quantifiable evidence.
2. Newton Valence Parish Council submits that the Community Feedback from Selborne is irrelevant and should be deleted in its entirety from the WEP. The reasons for this are that:
 - a. Only approximately 5% of NVF is within the Selborne Parish boundary.
 - b. The 59-page WEP makes no mention of any proposed development in Selborne with the exception of one sentence which says "The NVE is willing to work together with the SDNPA to fulfil housing requirements in Selborne." All other proposals are located in Newton Valence and have nothing to do with Selborne.
 - c. Selborne has very different needs and objectives to Newton Valence and as such the views of Selborne residents skew the results of the Community Feedback e.g. Selborne wishes to encourage tourism and Newton Valence does not, Selborne has a Housing Needs Survey, Newton Valence does not. One of the primary aims for Selborne is to encourage tourism to their area by supporting the development of a tourism hub within SDNP, this is the polar opposite to Newton Valence which wishes to preserve the tranquil nature of the environment and enable visitors to enjoy that aspect of a rural environment.
3. The need for housing cites a Selborne PC Housing Need Survey Report which is irrelevant to Newton Valence. As this Survey by Action Hampshire is at significant variance to the SDNPA Local Plan (which shows in Strategic Policy SD23 a need for 6 houses in Selborne and none in Newton Valence) the Parish Council believes that the WEP should omit all reference to any housing needs in either Parish until SDNPA reconciles the Local Plan with Selborne Parish Council. Whatever the outcome, a Survey conducted for Selborne cannot be used to support the need for housing in Newton Valence. Furthermore, the illustrations purporting to justify accommodation for estate staff due to their low salaries cannot be sustained as these questions were not part of the Selborne Housing Needs Survey which was dealing only with houses in Selborne not Newton Valence. The Community Feedback shows 68% of both Newton Valence and Selborne residents are opposed to the provision of housing.

4. The overall logic of the WEP is flawed because, on the one hand a case is made for “centralisation of the farm operations to one location....is key to ensuring the farm runs efficiently” whereas the WEP then seeks to make the case for decentralising the Riding School and Stables to two geographically dispersed sites with resultant inefficiencies caused by the extraneous movements of horses along the historic sunken lanes and the substantial increase in vehicular traffic created by the proposed DIY livery owners visiting their horses twice a day. The very significant Riding School and Stables developments suggested would also bring horse boxes and transporters into the centre of the village rather than the periphery where the current riding operations are centred, and the resultant mix of horses, vehicles and lorries would inevitably lead to an increased risk of accidents between vehicles and horses over and above the accident involving a horse and a farm tractor a year or so ago. No case has been made for DIY livery and the disadvantages of such an enterprise clearly outweigh any advantages and should be deleted from the WEP. All other proposed riding and stable related projects, if permitted, should be sited with the existing Livery Stables and not in the farmyards near the centre of the village.
5. Whilst the Parish Council agrees that “the grain store and dryer is incredibly outdated and inefficient” the WEP states that the objective of entering a joint venture with 4 other farms was to “pool machinery and resources to reduce overheads and farm in a more cost effective manner”. The WEP fails to address the issue of pooling the grain store and dryer. Clarity is required as to whether:
 - a. The proposed new Newton Valence grain store and dryer is to serve solely NVF or all 5 farms and if so, why?
 - b. Any of the other 4 farms have newer, more cost effective grain stores and dryers and if so, why NVF is not using one of these in furtherance of the joint venture objectives, thereby negating the need to replace the NVF grain store/dryer with concomitant reduction in overheads, capital and cost effectiveness?
 - c. Dependent on the answers to a and b above, the location of a grain store and dryer (if needed at all) should definitely NOT be near the centre of the village at the Upper Farmyard (as proposed) as this would have a very detrimental effect on the tranquillity of the village cited on numerous occasions in the WEP and as a key policy area in the SDNPA Local Plan. It should also be noted that tranquillity was rated as Very Important in the Village Plan. It would result in noise and dust when operating and would necessitate numerous HGV movements into and out of the village via the historic sunken lanes (all of which have a 7.5 ton weight restriction) and conflict with the aforementioned movements of horses past the current riding stables and dog walking routes. Easy access on a main highway is an effective and efficient way to transport materials to or from the facility, rather than through small village lanes. The current location on the A32 is clearly preferable in all

respects. The Parish Council had been informally advised previously by NVE that all farming operations were to be centred adjacent to the existing grain store/dryer on the A32 and not in the yards near the centre of the village.

6. The Parish Council wishes to draw the attention of SDNPA to the fact that NVF currently owns 14 properties (including the holiday lets) out of a total of 90 properties in the village which is a high proportion for such a small community with little, if any infrastructure (Newton Valence is in Tier 5 of the SDNP Settlement Hierarchy with a score of 1 for the village hall). The proposals in the WEP for additional staff and partner accommodation (excluding any new holiday homes) would appear to increase the farm's residential properties to 23, which appears by any standards to be a disproportionate ratio in a village of this size.
7. The WEP ignores the fact that a number of other residents manage Holiday/Short Term Lets in the village, which reduces the need for any more.
8. The WEP details many NVF enterprises for growth but nowhere is the issue of safety considered. The Parish Council considers that the tipping point between growth, lack of infrastructure and safety will be breached if all the proposed developments were allowed.
9. The WEP clearly demonstrates that diversification measures taken to date such as the Riding School and Shoot are helping to sustain the enterprise given the difficulties associated with the farming operations. The Parish Council supports these measures and understands the need for further measures but these should be of a gradual and evolutionary nature whereas the WEP is proposing many major developments which are not proportionate for a small village with little infrastructure and which, if implemented in full would immeasurably damage the character of the village which residents hold so dear.
10. For ease of editing by SDNPA and other parties it would help if the WEP had both page numbers and appropriate conventional paragraph/sub paragraph numbering. In the absence of these, and for the avoidance of doubt the Parish Council detailed comments will copy the relevant paragraph from the WEP where necessary with comments below.

DETAILED COMMENTS

1. 2.11 Farm Operations Para. 6

Together the joint venture now farms 5 farms collectively – adding a further 4 farms to the total farmed area of NVF: - New Buildings Farm, Stroud; Buriton Estates, Buriton; South Holt Farm, Rowland's Castle & Windmill Down Farm, Hambledon - see map 6 for farm locations. This increased the total cropped area from 376ha to 1000ha.

– Clarify wording: the combined cropped area is presumably now 1,000ha but the size of NVF remains the same.

2. 2.13 Inadown Farm Livery & Riding School Para. 5

In November 2016 IFLS successfully passed the British Horse Society's (BHS) 'Where to Train Centre' inspection. However without an Indoor arena they have been informed that they will not be able to utilise this accreditation.

– Supporting evidence needed for assertion that utilisation of BHS Training Accreditation is dependent on an indoor riding school – how important is it that the 'where to train' accreditation is granted given the growth of riding lessons, numbers of horses and increase in staff over recent years and the fact that IFLS is already accredited on the BHS website. It would appear from the WEP that the implementation of the training accreditation would result in 4 new student placements – hardly sufficient to justify the construction of an indoor arena.

3. 2.14 Inadown Farm Holiday Cottages

– Para. 2 As guests have been shown by different categories it would be useful to have a percentage breakdown of the guests by category to show how many are actually holiday lets versus the other categories as it is known by village residents (as a result of a village meeting with the Farm Owner in November 2014) that occupancy shown as short term lets are not restricted to 28 days as stated due to roll-over short term contracts leading to occupancy in excess of 6 months in some cases. This data would also assist with determining visitor traffic flow compared with the fixed population.

– Para. 2 The assertion that the number of guests could increase by 25% over the next three years has no supporting evidence and could just as easily decrease by 25%.

– Para. 2 The WEP needs to acknowledge the existence of a number of other holiday lets in the village which are not part of NVE but have been omitted and need to be taken into account as they too are used for categories of visitors listed in the WEP.

– Para. 2 – The need for increased capacity is not supported by the Community Feedback at Section 4 with 70% of residents against encouraging more visitors. Given that the WEP clearly states that the current occupancy rates could be improved and fails to take account of other holiday lets in the village there is no evidence given to justify the provision for extra holiday lets elsewhere on the estate.

4. 2.15 Commercial Property/Residential Lets

– Para. 3 states "Currently there are no commercial property lets on the estate". This is factually incorrect as a number of buildings in the Lower Farmyard are used by small businesses which pay rent to NVF.

5. 2.2 Building Assets

– Summary of Residential Property Table Commercial Value bears no relationship to the true market value of properties in Newton Valence and all of the property commercial values listed should be revised following a proper independent market valuation. By way of supporting evidence recent sales of smaller NV houses than Woodside have achieved in excess of £480,000 and a 3 bedroom bungalow was sold for £878,000 in 2015. The estimated values in the WEP are wildly inaccurate.

6. The Agri. Tie column states there is no agricultural tie on Flats 1 and 2 at Inadown Stables, which were built specifically as staff accommodation. Is this an error?

7. Existing Staff Accommodation Status Table and Pie Chart

– Freelance, Casual Labour and P/T should be excluded from the pie chart. There is no reason to provide accommodation for these categories and they are not included in any subsequent text which only states a need for F/T staff accommodation so they are irrelevant in the pie chart.

8. The need for Staff Accommodation Para. 2

– This para. Shows that with the existing accommodation for 5 F/T IFLS staff there is already 24 hour cover of 1 member of staff for every 10 horses plus a F/T gamekeeper for the birds which demonstrates that there is no case on welfare grounds for more staff accommodation. Furthermore, the assertion that "Advice from the District Vet suggests that there should be sufficient on-site cover at all times" is ambiguous - what level of staffing did the Vet think was sufficient? The final sentence should be deleted as the WEP makes clear there is an adequate bank of experienced staff living on site 24 hours a day.

9. Lack of Affordable Housing Table and supporting text

– This table is irrelevant to Newton Valence as it cites a Selborne PC Housing Need Survey Report. As this Survey by Action Hampshire is at significant variance to the SDNPA Local Plan (which shows a need for 6 houses in Selborne and none in Newton Valence) the Parish Council believes that the WEP should omit all reference to any housing needs in either Parish until SDNPA reconciles the Local Plan with Selborne Parish Council. Whatever the outcome, a Survey conducted for Selborne cannot be used to support the need for housing in Newton Valence. Furthermore, the illustrations purporting to justify accommodation for estate staff due to their low salaries cannot be sustained as these questions were not part of the Selborne Housing Needs Survey which was dealing only with houses in Selborne not NVE. The Community Feedback shows 68% of both Newton Valence and Selborne residents are opposed to the provision of housing.

10. 3 Income v Expenditure

Looking Forward Para. 1

– Second and third sentences state "However, if the BPS subsidy were to be lost post-Brexit, based on the 2017 forecast the farm would make a significant loss. It is unlikely that the farming operation could continue without subsidy support or, that the Estate would be able to sustain these losses in the long term".

As Brexit is scheduled for 2019 and the Action Plan at Sections 7 and 8 will extend beyond this timeframe and given the huge significance of this statement it is felt that the WEP should include a contingency plan to cover what is proposed if farming operations could not continue.

11. 4.1 and 4.2 Staff Engagement and Visitor Feedback

– provision of farm shop, café, restaurant within walking distance – the Parish Council wishes to point out that we already have these facilities in walking distance at East Tisted (Bowtells Farm Shop, Post Office and Stores), Selborne (Café, Shops, Pub) and

Farringdon (2 Pubs). Staff and Visitor feedback should be subservient to Community Feedback given the transitory nature and short duration of their stays in the village compared with the fixed population

12. 4.3 Community Feedback

- It is noteworthy from the feedback that the only proposals enjoying majority support by residents is farm conservation and broadband upgrade (both approximately 70% in favour) whereas every proposal for growing the estate is rejected by the majority (all approximately 30% in favour, 70% against).
- The WEP states that "The purpose of this was to solicit resident's views so that where possible these could be taken into account in preparing the WEP". It is clear that no notice has been taken of the feedback in updating the main body of the WEP as no modifications have been made compared with previous versions drawn up prior to the questionnaire responses being received with the exception of the Ecosystem Services Table (see 14 below).
- The Table showing how the Estate might be able to assist with Village Plan actions shows two actions where the Estate/Farm should have held village meetings or workshops the first regarding proposed developments and the second regarding alternative uses for redundant farm buildings. It is noteworthy that the Estate has not done so in the 18 months since the Village Plan was issued nor at any time during the drafting and re-drafting of the WEP which is now at version 10.
- In addition to the questionnaire responses, the Parish Council recommends that all comments received are tabulated verbatim in an Appendix to the WEP for future reference and action as was done with the Village Plan.

13. Second para. below Community Response to WEP proposals histogram

- third line, correction: 64% response rate should read 67% as stated in the Village Plan.

14. 5 Ecosystem Services Analysis Table

- a general observation on this Table is that this version of the WEP cites statistics from the questionnaire responses in the Strengths or Opportunities columns. As these are all minority percentages (in the low 30s) favouring various proposals this adds no value or justification. It could be more accurately argued that the majority percentages (65 -70s) should be shown in the Weakness or Threats columns.

15. 5 Ecosystem Services Analysis Table 4 Cultural Services Inspiration/Spiritual Values Weaknesses

- cites the Selborne PC Housing Needs Survey identifying a demand for 16 affordable rented properties and 11 shared ownership properties. This has nothing to do with Newton Valence and should either be deleted in its entirety or it should spell out explicitly that these houses will be built in Selborne (to be consistent with other data which does show proposed locations e.g. Upper Farmyard etc.) See general observations regarding the conflict between this survey and the SDNPA Local Plan.

16. Same para. Under Opportunities

– calls for identification of potential development sites for residential lets for local people including p/t estate staff/casual staff which contradicts the main body of the WEP which only states a need for accommodation for f/t staff. Furthermore the Opportunities text refers to such staff who originate from Selborne or NV. It is recommended that this Opportunity is deleted in its entirety as there is not any supporting evidence for it and it could not be policed or otherwise enforced.

17. Same Table Tranquillity

– Add Threat: More Visitors, Lorries to Grain store, DIY livery traffic etc. diminish Tranquillity. As stated previously Tranquillity is key in both the SDNPA Local Plan and Newton Valence Village Plan.

18. Ecosystem Services Analysis Table 4 Cultural Services Recreation and Tourism Services Opportunities

– provision of shops, restaurants within a short distance of holiday lets would discriminate in favour of short term visitors as residents do not want these facilities and are content to use the existing facilities in Selborne, other villages or Alton. Examples as listed above include East Tisted Stores/PO and Bowtells Farm Shop, 2 Farringdon Pubs and Selborne Café, Shops and Pub. It should be noted that villages on Exmoor/Dartmoor do not provide tourist facilities all over the moors - that is part of the charm!

19. Ecosystem Services Analysis Table 4 Cultural Services Recreation and Tourism Services Opportunities

– provision of children's facilities. This should be deleted as in Section 4.3 of the WEP it clearly states that the Estate cannot identify an Opportunity to assist with the provision of recreation facilities as it does not own land in the centre of the village. Furthermore, during a previous consultation with village residents NVE proposed a swimming pool but this was firmly rejected by a large majority. This view is likely to still prevail given the recent decision to replace Alton Sports Centre which includes provision of a 6 lane swimming pool and a teaching pool.

20. 6.2 Additional Information Future Estate Accommodation Needs Table

– Para 5. Why is it deemed necessary to offer accommodation to all stable staff – the only apparent justification is that those with aspirations to leave home can do so?

– The Future Estate Accommodation Table shows a need for 6 Units but fails to take account of the properties which are let e.g. Woodside which would be suitable for the existing partner or the incoming partner, the Goldridge Cottage (which has an agricultural tie) not occupied by a member of staff and Inadown Bungalow (currently vacant as uninhabitable but proposed to be replaced by 2 units) should be taken into account, thereby reducing the units required to 3 (or 2 if Inadown Bungalow is replaced by 2 units). All staff accommodation should be given an agricultural tie or the justification becomes worthless.