

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Chapter 9 – Sites and Settlements Introduction

There were a total of 56 representations on this section excluding those on specific sites or settlements and on omission sites. A summary of the main issues raised on matters relevant to the whole chapter or introduction text only is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National Agencies</u> Historic England: Disappointed that there is no reference to cultural heritage in Figure 9.1 (cultural ecosystem services). NPPF paragraph 7 states that protecting and enhancing the historic environment is an integral part of sustainable development.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> The Transport Assessment has not provided an assessment of individual development sites and HCC would encourage the NPA or individual site promoters to make use of the County Council development planning pre-application service that is designed specifically for this purpose. (Hampshire County Council) Note that level of detail across allocations varies across sites. Other than highlighting that some of these sites are close to sensitive designated areas, the City Council makes no comment on the individual allocations. (Winchester City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> The approach of the Local Plan and SDNPA to Neighbourhood Development Plans stifles the ability of | <p><i>I: There is no reference to cultural heritage in Figure 9.1 - Cultural Ecosystem Services</i> R: Figure 9.1 illustrates the Ecosystems Services that are able to be mapped using the newly developed piece of software, the GIS based tool EcoServe GIS. We accept that it is not able to map all ecosystem services but it is the best tool available at the current time. However, Core Policy SD2: Ecosystems Services and Figure 4.29 - The Four Aspects of Ecosystems Services (page 44 of the Local Plan) clearly make reference to cultural ecosystem services and the different ways in which cultural heritage can deliver ecosystem benefits.</p> <p><i>I: The approach of the Local Plan and SDNPA to Neighbourhood Development Plans stifles the ability of Easebourne Parish Council to make a long-term plan for the Parish. There is a lack of consideration given to 402 dwellings expected to be delivered at King Edward VII site.</i> R: The Local Plan development strategy recognises that Neighbourhood Development Plans (NDPs) are an important part of the statutory development plan and the SDNPA provides support and help to parish and town councils in the delivery of these. The Local Plan only seeks to allocate sites in settlements where an NDP has not done so. Easebourne Parish has not prepared an NDP for its parish and the Parish Council has confirmed in more recent months that it does not intend to do this. Instead they would wish to influence the design and layout of the proposed allocations in Easebourne through the preparation of a village</p> |

Chapter 9 – Sites and Settlements Introduction

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

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| <p>Easebourne Parish Council to make a long-term plan for the Parish, despite there being clear Central Government support for Neighbourhood Development Plans. On this basis, we seek the removal of the proposed allocations for Easebourne that are contained in the Pre- Submission Local Plan. There is a lack of consideration given to 402 dwellings expected to be delivered at King Edward VII, with the majority to be delivered in the first 5 year period; the cumulative impact of this along with development in Midhurst and Easebourne has not been properly assessed. (Easebourne Parish Council)</p> <p>Other organisations</p> <ul style="list-style-type: none"> • The Plan fails to take into account the development of sites where there is an extant planning permission where better use could be made thereof and an increased number of dwellings achieved to contribute to the overall housing provision figure. (Deansmoor Properties Ltd.) • Additional sites at more sustainable locations (land adjacent to existing settlements, in adjoining borough boundaries) should be considered appropriate highly sustainable development locations which can accommodate large scale growth than can bring beneficial infrastructure improvements. (EPV (East Sussex) Ltd.) • Another Call for Sites assessment is required to ensure that all possible sites for development are objectively assessed and to ensure that the Authority are not dismissing suitable sites for development under the guise of complying with the Framework, and heavily relying on cross boundary development. (EPV (East Sussex) Ltd.) | <p>design statement and local landscape character assessment. Therefore this issue is no longer considered relevant.</p> <p>In terms of the King Edward VII site, the purpose of Strategic Policy SD26: Supply of Homes is to set out a figure for new homes within an individual settlement rather than a total for the parish as a whole. A large number of dwellings will be delivered at the King Edward VII site (some 4.5km from Easebourne along a national speed limit road) as part of enabling development to secure the future of the heritage at the complex however this does not contribute significantly to the future sustainability of the settlement of Easebourne in terms of its facilities and services. Therefore SD26 makes provision for a total of 50 dwellings to be delivered in the settlement of Easebourne.</p> <p>I: The Plan fails to take into account the development of sites where there is an extant planning permission</p> <p>R: The Housing Update Background Paper (TSF 07a) Figure 3 provides a figure of 898 dwellings that are expected to be delivered through the implementation of extant planning permissions on sites that have not been allocated. This element of supply will significantly contribute to meeting the overall housing provision figure for the National Park.</p> <p>I: Additional sites at more sustainable locations should be considered</p> <p>R: The South Downs Local Plan proposes a detailed and robust approach to housing supply, which addresses the National Park statutory duty whilst prioritising the preservation of the special qualities. This approach is set out in the Housing Supply Background Paper (TSF 07).The overall supply has been derived from a detailed consideration of the capacity and sustainability of individual settlements. It has been informed in particular by the identification of suitable housing sites through the Strategic Housing Land Availability Assessment (SHLAA TSF 10), together with assessment of settlement facilities, and regard to historic development trends. Above all, a landscape-led approach has been taken, with over-riding regard to the objective of preserving and enhancing the special</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

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| <ul style="list-style-type: none"> The SDNPA has been unable to allocate any new traveller pitches as part of housing land allocations or within settlement boundaries. The allocations proposed will help address the need of those already occupying the area. However no new provision is made for those unable to so far secure permission to live in the SDNP or displaced from the area. (Heine Planning Consultancy) Not "positively prepared", as there are further sites that can and should be allocated to contribute to the requirement in the NPPF to boost significantly the housing supply of the South Downs National Park Authority. Not "Justified" as the plan's strategy, by not allocating further sites, is missing a clear opportunity to include sites that are deliverable, developable and viable. (Reside Developments Ltd.) Concerned about the evidence base supporting the site allocations within this chapter. NPPF paragraph 165 is clear that planning policies should be based on up-to-date information about the natural environment. The SDNPA is not adhering to the purposes if no on the ground ecological surveys were undertaken to inform the plan - noting that many of the allocations do not specify the need for an ecological assessment, even in the supporting text; particularly puzzling for those site allocations that contain ecosystem services symbol. Request that list of evidence studies that applicants are required to produce should be in the policy rather than the supporting text. Inconsistent approach to requiring development to deliver biodiversity enhancements / improvements. (Sussex & Hampshire and Isle of Wight Wildlife Trusts) Many of the sites entered as part of the SHLAA process were discounted on the basis of adverse impact on | <p>landscape character of the National Park. It is therefore considered that the most suitable sites have been allocated for development based on this approach and that all alternatives have been fully explored.</p> <p>I: No new gypsy and traveller provision is made for those wishing to move into the area R: The Gypsy, Traveller and Travelling Showpeople Background Paper 2018 Update (TSF14) sets out the level of need in each local authority area and explains how all potential sites that may be suitable to accommodate any existing unmet and future need have been assessed.</p> <p>I: Concerned about the lack of evidence base supporting the site allocations within this chapter and there is an inconsistent approach to requiring development to deliver biodiversity enhancements / improvements R: It is considered that each allocation is supported by a robust and proportionate evidence base. Policy SD9 and supporting text (in particular paragraph 5.72) sets out requirements for all development to conserve and enhance biodiversity, and to provide appropriate information and evidence on potential impacts to wildlife sites.</p> <p>I: The landscape assessment of the site allocations appears to be generic, as opposed to site specific, and is therefore not robust. R: A site-specific assessment of landscape sensitivity was conducted by the SDNPA's Landscape Officer to inform the SHLAA in accordance with established best practice. The key conclusions of this work are presented in the SHLAA (TSF 10).</p> <p>I: How will ecosystem services be quantified? R: The criteria of Policy SD2 list different ways in which development proposals can have an overall impact on the ability of the natural environment to contribute goods and services. The two technical advice notes that support this policy</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>landscape or heritage assets; the assessment appears to be generic, as opposed to site specific, and not therefore robust. The landscape assessment is not published anywhere so it is difficult to understand the rationale for excluding certain sites. (The Angmering Park Estate, The Edward James Foundation – West Dean)</p> <p>Individuals</p> <ul style="list-style-type: none"> • How will ecosystem services be quantified? (Hampshire County Council – Cllr Jackie Porter) • The plan fails to provide adequately for the housing needs of the part of the National Park falling within the Horsham District. • Paragraph 9.3 should state categorically that the Plan incorporates all adopted Neighbourhood Plan policies and allocations. To do otherwise would be counter to the Localism Act 2011 and would thus make the Plan unsound. | <p>(Ecosystem Services and Householder Planning Applications and Ecosystem Services Technical Advice Note (non-householder) – Core document ref 06 and 07) provide practical guidance on how Ecosystem Services can be implemented in a development proposal. The target for Policy SD2 set out in figure 10.2 is to ensure that all development has a net positive impact on the ability of the environment to deliver ecosystem services. The evidence for this will be gathered through EcoServ mapping.</p> <p>I: Paragraph 9.3 should state categorically that the Local Plan Policies Map incorporates all adopted Neighbourhood Plan policies and allocations.</p> <p>R: The Local Plan Policies Maps are updated to show Neighbourhood Development Plan (NDP) policies and allocations once a Neighbourhood Plan had been Made i.e. adopted. The Policies Map is not itself part of the statutory development plan and will be continually updated to reflect the making of further NDPs.</p> |

Summary of Issues and Responses

Policy SD58: Former Allotments, Alfriston

There were a total of 4 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National Agencies</u> Environment Agency – The policy could be more effective in managing flood risk if it included the requirement for flood storage compensation as recommended in the SDNPA’s Level 1 Update and Level 2 SFRA Final Report. Historic England - Criterion 1 a) should refer to the “special interest, character and appearance” of the Alfriston Conservation Area. Welcomes and supports the recognition of the sensitivity of the site within the conservation area.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> No comments received. <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Alfriston Parish Council broadly welcomes the introduction of affordable housing in the village but has concerns regarding: the deliverability of the site as it is in multiple ownership; part of the site is located in a flood plain and the proposed access is dangerous. <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Consider that there are sustainability and deliverability issues with the proposed allocation and that the site at | <p><i>I: The policy could be more effective in managing flood risk if it included the requirement for flood storage compensation as recommended in the SDNPA’s Level 1 Update and Level 2 SFRA Final Report.</i> R: It is proposed to make this change with the addition of criterion k) “Flood compensation storage should be provided for any ground raising or built development on Flood Zone 3 (including allowance for future climate change).” (Please see page 26 of the Schedule of changes, Para Policy ref: SD58(1))</p> <p><i>I: Criterion 1 a) should refer to the “special interest, character and appearance” of the Alfriston Conservation Area</i> R: It is considered unnecessary to add any additional wording to this criterion and that the current wording in this criterion is sufficient to highlight this issue. Development proposals would also be subject to the requirements of the NPPF relating to conserving and enhancing heritage assets and Local Plan policy SD 15: Conservation Areas.</p> <p><i>I: Concerns regarding: the deliverability of the site as it is in multiple ownership; part of the site is located in a flood plain and the proposed access is dangerous</i> R: The SDNPA is confident that this site can be delivered. The site is has two owners and they have confirmed that the site is available. Hampshire County Council’s (HCC) Engineering Consultancy was commissioned by the SDNPA to provide highways advice for a number of site allocations including this one, which</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>Barlavington Way, Midhurst which performs better in sustainability terms should be allocated instead. (ICS Estates Ltd.)</p> <p><u>Individuals</u> No comments received.</p> | <p>is set out in the Site Allocations Highways Assessment Report March 2017 and Update March 2018 (Core documents SS08 and SS08a). This concludes that the site in principle can be safely accessed. The SDNPA's Level 1 Update and Level 2 SFRA (Core Document TSF 45) has demonstrated that the site can be developed without risk of flooding subject to more detailed assessment at the planning application stage.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD59: Kings Ride, Alfriston

There were a total of 5 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National Agencies</u></p> <ul style="list-style-type: none"> No comments received. <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> No comments received. <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Alfriston Parish Council welcomes the development of the site, provided it is done with a design brief. The inclusion of affordable housing is supported. <p><u>Other organisations</u></p> <ul style="list-style-type: none"> The ability of the site to accommodate development has not been tested in a LIVIA. Land south of Barlavington Way, Midhurst performs better in sustainability terms and should be allocated instead. (ICS Estates Ltd) Support this policy as it will deliver affordable housing in the village, represents proportional growth, will become part of the built up area of the village and complies with the NPPF. (Impact Planning Services) Concerned about the evidence base supporting the allocations, in particular in relation to biodiversity as many of the allocations omit the need for ecological assessment. In addition there are inconsistencies with some sites requiring biodiversity improvements, others biodiversity enhancements and some no | <p><i>I: The ability of the site to accommodate development has not been tested in a LIVIA [Landscape Impact and Visual Impact Assessment]</i> R: All site allocations have been assessed by the SDNPA's landscape officer with regards to sensitivity of the landscape and impacts of development on landscape character. The site has been identified as having a medium landscape sensitivity due to its location on the upper valley sides of the Cuckmere valley and being alongside the South Downs Way national trail. This is recognised by the policy, which seeks to ensure a suitable transition in built form and fabric from the residential development to the east and north and the open countryside to the south and west; by ensuring private amenity space and vehicular parking is suitably sited and landscaped; and boundary treatments are appropriate for a site adjacent to open countryside. It is also considered that the redevelopment of this brownfield site provides the opportunity to improve the appearance of the site as currently it is occupied by three dilapidated agricultural buildings and areas of hardstanding.</p> <p><i>I: Concerned about the evidence base supporting the allocations, in particular in relation to biodiversity as many of the allocations omit the need for ecological assessment</i> R: All site allocations are supported by a robust and comprehensive evidence base as explained in the Sites and Settlement Route Map Background Paper Sept 2017 (Core Document SS 02). Paragraph 9.23 of the supporting text of this policy refers to development proposals needing</p> |

Policy SD59: Kings Ride, Alfriston

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>biodiversity requirements at all. Also recommend that allocations containing ecosystem services symbols contain a caveat in the policy to ensure that enhancements to natural capital are not limited to those requirements listed specifically in the policy (Sussex and Hampshire Wildlife Trusts)</p> <p><u>Individuals</u></p> <ul style="list-style-type: none"> Concerns about asbestos in the roof of the barn and that the existing drainage infrastructure is at capacity. The site is unsuitable for affordable housing and instead should be developed for houses that are in keeping with the surrounding properties. | <p>to be informed by an Ecology Assessment, including a Protected Species Survey, therefore it is considered that this issue has been addressed.</p> <p><i>I: The site is unsuitable for affordable housing and instead should be developed for houses that are in keeping with the surrounding properties</i></p> <p>R: The affordability of housing is major barrier to sustainable communities in the National Park. The SDNPA 's Housing and Economic Development Needs Assessment (HEDNA), Sept 2017 (Core Document TFS 08), which supports the Local Plan Affordable Housing policy SD28, concluded that there is strong justification for policies that seek to maximise delivery of affordable housing. It is considered that a high quality scheme, that is in keeping with the surrounding suburban character of King's Ride can be delivered at this site, while providing for a mix of housing types and a suitable transition to the open countryside beyond.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD60: Land at Clements Close, Binsted

There were a total of 4 responses to this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u> No comments received</p> <p><u>Borough, City, Council and District Councils</u> Hampshire County Council: request pedestrian link from allocation to Footpath 28. Will seek developer contribution towards future maintenance.</p> <p><u>Parish and Town Councils</u> No comments received</p> <p><u>Other organisations and individuals</u></p> <ul style="list-style-type: none"> Land south of Barlavington Way, Midhurst has been subject to a detailed LVIA, Clements Close has not. It is also in a more sustainable community than the site at Binsted. (ICS Estates LTD) The effect of the settlement boundary around the main village will be to limit development elsewhere and for the other small communities in the Parish to dwindle. The level of development proposed will increase further the pressure on house prices, pricing most people out. Suggest small allocations in the smaller villages and hamlets, total number of homes to increase to approx. 40 and 50% to be affordable. | <p><i>I: Request pedestrian link from allocation to Footpath 28.</i> R: An additional criterion has been added in the Schedule of Changes (SDNP 01.1) to state: ‘...provides a pedestrian link to adjoining Footpath 28’.</p> <p><i>I: Land south of Barlavington Way, Midhurst has been subject to a detailed LVIA, Clements Close has not.</i> R: The Local Plan has considered the landscape impact of all of the Site Allocations and additional criteria set out where further landscape assessments may be required when an application comes forward. Sites have been put forward for allocation through a process of ‘on balance’ decision making. Responses to representations on Omissions Sites are dealt with elsewhere in this document.</p> <p><i>I: Suggest small allocations in the smaller villages and hamlets, total number of homes to increase to approx. 40 and 50% to be affordable.</i> R: This site was considered to be suitable for allocation through the decision making process set out in the Local Plan and background evidence, particularly background papers SS01 Sites and Settlements/SS02 Sites and Settlements Route Map. This policy is consistent with the affordable housing policy set out in Policy SD28.</p> <p><i>I: Allocation is within 5km of Wealden Heaths Phase 2 SPA. A strategic approach to mitigating recreational disturbance is needed.</i> R: Policy SD10 sets out the approach to development within the buffer zone of the Wealden Heaths SPA.</p> |

Policy SD60: Land at Clements Close, Binsted

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none">• Allocation is within 5km of Wealden Heaths Phase 2 SPA. A strategic approach to mitigating recreational disturbance is needed. See RSPB comments on SD10. (RSPB) | |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD6I: New Barn Stables, The Street, Binsted

There was 1 response to this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u> No comments received</p> <p><u>Borough, City, County and District Councils</u> No comments received</p> <p><u>Parish and Town Councils</u> No comments received</p> <p><u>Other organisations and individuals</u></p> <ul style="list-style-type: none">• Inconsistencies amongst the allocations in terms of biodiversity requirements. Reassess site to ensure that existing biodiversity value has been considered. Up-to-date ecological information should be set out in the supporting text. (Sussex and Hampshire Wildlife Trusts) | <p>Policy SD9 and supporting text (in particular paragraph 5.72) sets out requirements for all development to conserve and enhance biodiversity, and to provide appropriate information and evidence on potential impacts to wildlife sites.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues

Policy SD62: Land at Greenway Lane, Buriton

There were a total of 7 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and SDNPA Response (I/R) |
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| <p><u>National Agencies</u></p> <ul style="list-style-type: none"> No comments received <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> No comments received <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> If development goes ahead, should provide a soft landscaped edge to the settlement. (Buriton PC) Support requirements (a) to (f) in policy. (Buriton PC) Add requirement to policy for a new foot/cycleway to be provided between the site and Greenway Lane railway bridge- potentially within the field boundary. This would connect the village with the main bus service stop at Greenway Lane roundabout- local bus service to the village is likely to be lost. (Buriton PC) Re. Kiln Lane alternative site: consider VDS statement on the need not to exacerbate flood risk. (Buriton PC) Re. Kiln Lane alternative site: site has serious flooding problems, acts as a soakaway to prevent flooding in the village itself, is important to the setting of the village, could casue traffic and road safety problems and necessitate the reintroduction of road signs to the nearby crossroads, and may contain valuable wildlife. (Buriton PC) If the Kiln Lane site were taken forward, it should be limited to the Preferred Options boundary, the capacity of the local drains increased, should comprise well designed 2-3 bedroom and affordable housing, consider retaining the existing hedgerow to Kiln Lane, and use appropriate traffic calming measures. (Buriton PC) | <p><i>I: The Kiln Lane site should be the preferred Site Allocation</i> R: The Land at Greenways has been put forward as the preferred site following further assessments. The process for site selection is set out in the Sites and Settlements background document (SS01) and the Route Map (SS 02). The Landscape Background Paper (TLL 01) sets out the approach to landscape issues within the Local Plan. A Landscape and Visual Impact Assessment has been added to the policy criteria within the Schedule of Changes to the Pre-Submission Plan (p27).</p> <p><i>I: Suggest requirement for a new footpath</i> R: This is now proposed on p27 of the Schedule of Changes to the Pre-Submission Plan.</p> <p><i>I: Site should be reassessed to ensure that the existing biodiversity value has been properly considered, and include a requirement for up-to-date ecological information and conservation and enhancement of biodiversity.</i> R: Policy SD9 and supporting text (in particular paragraph 5.72) sets out requirements for all development to conserve and enhance biodiversity, and</p> |

Policy SD62: Land at Greenway Lane, Buriton

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues

| Representations | Issue and SDNPA Response (I/R) |
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| <ul style="list-style-type: none"> Consider the increased number of pedestrians likely to use Kiln Lane following the extinguishment of part of Footpath 3. (Buriton PC) <p>Other organisations</p> <ul style="list-style-type: none"> Propose deletion of the site due to clear adverse landscape impacts and the low rating of the village in the SFA, and its replacement with allocation of land south of Barlavington Way, Midhurst. (ICS Estates) Evidence base supporting the allocations is insufficient. Ecosystem services approach does not seem to have fed into site selection, but was retrofitted afterwards. Site allocations should be reassessed, including with on-the-ground ecological to ensure existing biodiversity value is properly considered. Inconsistent approach to biodiversity between the different allocations. All allocation policies (not supporting text) should include a requirement for up-to-date ecological information and conservation <i>and</i> enhancement of biodiversity. Allocations containing ecosystem services symbols should contain a caveat in the policy to ensure that enhancements to natural capital are not limited to those requirements listed specifically in the policy. (Wildlife Trusts) <p>Individuals</p> <ul style="list-style-type: none"> One representation was made on behalf of three separate landowners of an alternative site at Kiln Lane- logged as three representations, one from each landowner. Key points as follows: The Kiln Lane site was assessed favourably in both iterations of the SHLAA and proposed as an allocation at Preferred Options. The site has now been withdrawn, apparently due to negative landscape impact, but no reasoning for this change has been given, despite requests- this is unreasonable and unsound. The Greenway Lane site was rejected from the 2016 SHLAA due to negative landscape impact. Agree with this assessment- the site has a prominent position and is highly visible in views from the scarp slope to S. Propose that the Kiln Lane site has a better relationship to the landscape. The Greenway Lane site has not been assessed for highway safety. A new access here would be harmful to highway safety and necessary visibility splays for the site would | <p>to provide appropriate information and evidence on potential impacts to wildlife sites.</p> <p>I: The policy has not been informed by the Ecosystem Services approach R: How Ecosystem Services have been addressed is set out in documents Core 04 to Core 06 in the examination library. Our response to representations received on Ecosystem Services can be found under policy SD2 of this document.</p> |

Policy SD62: Land at Greenway Lane, Buriton

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues

| Representations | Issue and SDNPA Response (I/R) |
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| <p>require the loss of significant amounts of hedgerow, contradicting criterion (b) of the policy. This is not the case at Kiln Lane.</p> <ul style="list-style-type: none">• The Kiln Lane site is in a more accessible location.• The Kiln Lane site could provide a significant amount of land for wider community benefits, e.g. community parking, allotments and play space. The Greenway Lane site could not.• A community consultation exercise showed that there is strong support for an allocation on Kiln Lane.• Propose deletion of the Greenaway Lane allocation and replacement with an allocation of 8-10 dwellings at Kiln Lane. | |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD63: Land south of the A272 at Hinton Marsh, Cheriton

There were a total of 8 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National Agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Expect development at this location to provide a contribution towards enhancing the Bramdean and Hinton Ampner Footpath I which runs north on the opposite side of the to make a more attractive green travel route (Hampshire County Council). <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Comment that this allocation may impact the parish council's affordable housing plans (Bramdean & Hinton Ampner Parish Council). Objection to the policy on grounds: (Cheriton Parish Council) <ul style="list-style-type: none"> it does not accord with purposes and duty of the National Park not consistent with the development strategy, the quantum is major development, location to headwaters of the River Itchen SAC, lack of facilities, impact on landscape and access problems flawed and lacking evidence base a number of specific issues with the wording of the policy which is considered to be imprecise and misleading. | <p><i>I: Expect development at this location to provide a contribution towards enhancing the Bramdean and Hinton Ampner Footpath I</i> R: Criteria I (f) requires off-site pedestrian access improvements.</p> <p><i>I: Objection to the principle of the allocation with the following reasons: not consistent with the development strategy</i> R: The site is consistent with the medium dispersed development strategy as outlined in the Local Plan.</p> <p><i>I: the quantum is major development</i> R: The Authority does not consider that this allocation constitutes major development as defined by national policy or Policy SD3 of this Local Plan as it does not have the potential to have a serious adverse impact on the natural beauty, wildlife or cultural heritage of, or recreational opportunities provided by, the National Park.</p> <p><i>I: site constraints including: landscape and heritage impacts (e.g. proximity to Hinton Ampner House and Gardens), location to headwaters of the River Itchen SAC, access problems, groundwater flooding from winterbournes</i></p> |

Policy SD63: Land south of the A272 at Hinton Marsh, Cheriton

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Commented that the site is subject to the following constraints: River Itchen SSSI and SAC, Hinton Ampner House and Gardens, and groundwater flooding from winterbournes. Barlavington Way, Midhurst, does not have these constraints and is a more sustainable site (ICS Estates Ltd). Support for the allocation on grounds it will support the long term conservation of the Hinton Ampner Estate for wider public benefit and support the purposes and duty of the National Park with regard to housing and recreation space. The National Trust is satisfied that the requirements of the policy can be met (National Trust). <p><u>Individuals</u></p> <ul style="list-style-type: none"> Objection to this site on the grounds: (Individual – 18286337) <ul style="list-style-type: none"> Not promoted through the call for sites Unsupported by publicly available assessment to justify deliverability Unsustainable location with no viable and safe accesses Rejected in 2016 SHLAA Potential loss of historic buildings Lack of facilities and amenities Not consistent with findings of evidence Landscape impacts Objection to this policy on the grounds: (Individual – 18080321) <ul style="list-style-type: none"> shortcomings with the SA and HRA proximity of the site to the headwaters of the River Itchen SAC access problems, flawed and lacking evidence base, and a number of specific issues with the wording of the policy which is considered to be imprecise and misleading. | <p>R: It is considered that the constraints identified can be overcome. The policy contains a number of criteria requiring the constraints to be addressed (a, b, d, f, and h).</p> <p><i>I: lack of facilities and unsustainable location</i></p> <p>R: It is considered that the scale of development proposed is suitably supported by local village facilities present and will indeed provide increased custom to support the continued presences of these facilities. Cheriton is located within approximately 20 minutes of the significant facilities and services of Winchester by car and has a bus route.</p> <p><i>I: flawed and lacking evidence base</i></p> <p>R: All sites in the Local Plan have been subject to transport, landscape, sustainability appraisal and habitats regulations assessments which have been prepared robustly following the requirements of legislation and guidance in the NPPF and NPPG. Further evidence will be required to support a planning application. A list of those studies is set out in paragraph 9.45 of the Local Plan with the addition of further transport assessment including vehicular access assessment as set out on page 28 of the submitted Schedule of Changes.</p> <p><i>I: Wording of the policy is considered to be imprecise and misleading</i></p> <p>R: The wording is considered appropriate in setting out the principles of the development requirements of the site but not overly prescriptive to allow for appropriate consideration of site specific details that come forward at the application stage.</p> |

Summary of Issues and Responses

Policy SD64: Land South of London Road, Coldwaltham

There were a total of 60 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National Agencies</u></p> <p>Natural England state that the site lies directly adjacent to Waltham Brooks SSSI and is in very close proximity to Arun Banks SPA, SAC and Ramsar Site. Their key concerns are as follows:</p> <ul style="list-style-type: none"> Concerns over the hydrological impacts on Arun Banks and request that the development be connected to the main sewerage system. A well-designed SuDs feature is required The site has been in receipt of Organic HLS for over 10 years. The existing biodiversity value of the site must be ascertained in order to achieve the level of assessment required by the NPPF and to identify potential mitigation/compensation measures. The remainder of the site left undeveloped should maximise opportunities to maintain biodiversity and seek all opportunities to enhance this. Notes the intention to provide the residual area of the allocation as accessible, landscaped open space with the primary purpose of providing an alternative to designated sites in the Arun Valley. Concerned that the use of the remainder of the site entirely for recreational use would risk | <p><i>I: Concerns over the hydrological impacts on Arun Banks and request that the development be connected to the main sewerage system.</i> R: The requirement for a connection to the main sewerage system has been added as a policy requirement in the Schedule of Changes.</p> <p><i>I: A well-designed SuDs feature is required.</i> R: The provision of a SuDs feature added as a policy requirement in the Schedule of Changes.</p> <p><i>I: The site has been in receipt of Organic HLS for over 10 years. The existing biodiversity value of the site must be ascertained in order to achieve the level of assessment required by the NPPF and to identify potential mitigation/compensation measures.</i> R: Phase 1 and 2 ecological surveys have been commissioned and completed following the advice of Natural England and the Sussex Wildlife Trust.</p> <p><i>I: The remainder of the site left undeveloped should maximise opportunities to maintain biodiversity and seek all opportunities to enhance this.</i> R: The requirement to maximise and enhance biodiversity on the residual part of the site has been added to the Schedule of Changes.</p> <p><i>I: Concerned that the use of the remainder of the site entirely for recreational use would risk having a deleterious impact on any opportunities maintain and enhance biodiversity.</i></p> |

Policy SD64: Land South of London Road, Coldwaltham

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>having a deleterious impact on any opportunities maintain and enhance biodiversity.</p> <ul style="list-style-type: none"> Advise that the Sussex Wildlife Trust is consulted on this proposal for their views on any impacts on the adjacent SSSI, which they manage. The number of dwellings delivered at this site should be commensurate with the close proximity of the SSSI/SPA/Ramsar Site and with the existing value of the site for biodiversity. The NPA will need to demonstrate how the allocation adheres to the mitigation hierarchy required by paragraph 118 of the NPPF namely avoid, mitigate, compensate. Opportunities to secure a net gain for nature and local communities should be sought, as outlined in paragraphs 9, 109 and 152 of the NPPF. The NPA should follow the mitigation hierarchy as set out in paragraph 118 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into any potential development proposal. <p>Southern Water commented as follows:</p> <ul style="list-style-type: none"> There is currently sufficient capacity in the water and sewerage networks to accommodate the development. There is underground water and wastewater infrastructure that needs to be taken into account when designing the proposed development. An easement would be required, which may affect the site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting. The site is also adjacent to Coldwaltham Wastewater Treatment Works (WTW) and there is concern is that the | <p>R: The Authority understands the need to balance the recreational use of the residual area with the need to retain and enhance the existing biodiversity value of the site. This reflected in amendments to criteria 1 and 2 (b) and (c) of the Policy set out in the Schedule of Changes. The Meadow Management Plan will ensure that the enhancements to biodiversity take place.</p> <p>I: Advise that the Sussex Wildlife Trust is consulted on this proposal for their views on any impacts on the adjacent SSSI, which they manage.</p> <p>R: The Wildlife have been consulted and work is underway on a Statement of Common Ground.</p> <p>I: The number of dwellings delivered at this site should be commensurate with the close proximity of the SSSI/SPA/Ramsar Site and with the existing value of the site for biodiversity.</p> <p>R: The Phase 1 and 2 ecological surveys demonstrated that, from an ecological prospective, this development would not impact on the nearby Waltham Brooks / Arun Valley site due to the nature of the site being very different i.e. dry meadow rather than wetland grazing marsh. The site is not suitable for waders and wildfowl, nor does it support any ditches.</p> <p>I: The NPA will need to demonstrate how the allocation adheres to the mitigation hierarchy required by paragraph 118 of the NPPF namely avoid, mitigate, compensate.</p> <p>R: The evolution of the site allocation between the Preferred Options Local Plan and the Submission Local Plan shows how the Authority has sought to follow the mitigation hierarchy. The area of the site identified for development of residential dwellings and a shop unit has been repositioned from the south east to the north east of the site. This move sets the development back to avoid some of the direct impacts, which could have occurred to the ecologically sensitive area (SSSI) to the south west of the site. Furthermore, a series of new criteria have been added to ensure that any potential adverse impacts are duly mitigated/compensated for example, the Meadow Management Plan.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>proximity of the new homes to the WTW would have an unacceptable impact on the amenity of the site's future occupants arising from the WTW's essential operational activities. It is therefore important that the layout of any development scheme at this site should be informed by an odour assessment, to ensure there is adequate separation from the WTW.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> WSCC support the allocation subject to satisfactory Road Safety Audits being carried out prior to the Local Plan examination. <p><u>Parish and Town Councils</u></p> <p>Coldwaltham Parish Council commented as follows:</p> <ul style="list-style-type: none"> The policy is unsound because no public consultation took place prior to its publication. The parish council does not support major development here or at any of the other sites put forward in the village. The parish council has consulted widely on the scheme and there are significant concerns on both the site and the consultation process. The parish council supports development which is affordable and would bring new people into the village, especially to support the school. A housing Survey completed four years ago suggested that the current development of eight affordable houses at Silverdale, Coldwaltham, would go some way to satisfying demand. Proposes that the SDNPA should consider the potential for small scale developments of 6-8 houses, which would avoid | <p><i>I: Opportunities to secure a net gain for nature and local communities should be sought, as outlined in paragraphs 9, 109 and 152 of the NPPF.</i> R: Measures that will provide a net gain in biodiversity are set out in the Phase 1 and 2 ecological surveys. These measures will be secured through the Meadow Management Plan.</p> <p><i>I: The NPA should follow the mitigation hierarchy as set out in paragraph 118 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into any potential development proposal.</i> R: These matters are considered in the Phase 1 and 2 ecological surveys.</p> <p><i>I: There is underground water and wastewater infrastructure that needs to be taken into account when designing the proposed development. An easement would be required, which may affect the site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.</i> R: This is a matter that will be addressed at the planning application stage.</p> <p><i>I: The site is also adjacent to Coldwaltham Wastewater Treatment Works (WTW) and there is concern is that the proximity of the new homes to the WTW would have an unacceptable impact on the amenity of the site's future occupants arising from the WTW's essential operational activities. It is therefore important that the layout of any development scheme at this site should be informed by an odour assessment, to ensure there is adequate separation from the WTW.</i> R: A new criterion has been added to the Schedule of Changes to address this matter.</p> <p><i>I: The policy is unsound because no public consultation took place prior to its publication.</i></p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>the impact on landscape, traffic and ecology of a new 30 house estate' in a small community and location.</p> <ul style="list-style-type: none"> • The status and costs of maintaining the public open space land have not been addressed. • The site is one of only two in the National Park that were judged in the Sustainability Appraisal to have a likely adverse effect on the landscape, which is of high sensitivity in the Arun Valley. • There are a significant number of ecological factors attached to this field. • The Village Plans of 2004 and 2014 rejected large scale development as there is very limited infrastructure, public transport or employment opportunities. • The A29 is a very busy, signposted 'trunk road' which carries traffic between the South Coast, via Gatwick and Horsham. Any further access roads from significant housing locations will add to traffic and accident risks, especially at morning and evening peak hours. • This development is extremely upsetting locally. It will result in the coalescence of Coldwaltham and Watersfield and destroy a beautiful view of the South Downs from the A29 (Bury PC) <p>Other organisations</p> <p>The Sussex/Hampshire Wildlife Trust commented as follows:</p> <ul style="list-style-type: none"> • The site adjoins the Sussex Wildlife Trust's Nature Reserve at Waltham Brooks and we therefore have on the ground knowledge of the area. • The Trusts have seen no published evidence which has assessed the biodiversity value/potential of the allocated land itself. There is some high-level consideration of the potential | <p>R: An alternative site was identified as a draft allocation in the Local Plan: Preferred Options. This site was within the same landholding and located to the north east of the site. This site was not taken forward to the Pre-Submission in response to representations received on the site in regard to proximity to the nature conservations sites and the sewage works.</p> <p><i>I: The parish council does not support major development here or at any of the other sites put forward in the village.</i></p> <p>R: The Authority does not consider that this allocation constitutes major development as defined by national policy or Policy SD3 of this Local Plan as it does not have the potential to have a serious adverse impact on the natural beauty, wildlife or cultural heritage of, or recreational opportunities provided by, the National Park.</p> <p><i>I: Proposes that the SDNPA should consider the potential for small scale developments of 6-8 houses, which would avoid the impact on landscape, traffic and ecology of a new 30 house estate' in a small community and location.</i></p> <p>R: The Authority has considered all the sites put forward for housing development in Coldwaltham and considers that the draft allocation is a suitable site the development of which will deliver multiple benefits to the village and the National Park such as new open space, net biodiversity gain on the open space, a shop for the village and a substantial number of affordable homes.</p> <p><i>I: The status and costs of maintaining the public open space land have not been addressed.</i></p> <p>R: A Meadow Management Plan is currently being prepared by the Authority to ensure that the residual land is maintained in a manner that will deliver net biodiversity gain.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>for adverse impact on adjoining and nearby land because they have national and international designations (Waltham Brooks SSSI; Arun Valley SPA/SAC/Ramsar), but none about the site itself or its potential wider contribution to ecosystems services.</p> <ul style="list-style-type: none"> Although the Sussex Wildlife Trust has not surveyed the site, a quick visual inspection by their Senior Ecologist has suggested that the site is at least a semi-improved hay meadow, with potential for pockets of acidic grassland flower-rich hay-meadow. An ecological survey carried out by an appropriately qualified ecologist is required. The biodiverse grassland in this location buffers Waltham Brooks nature reserve, acting as part of the National Park's ecological network and connecting to other nearby designated sites such as Watts Farm Meadow and Alban Head Playing Field Local Wildlife Sites. The landowner has been in receipt of public funds to create beneficial grassland habitat and this should be weighed in the overall balance of considerations as to whether an allocation is justified. The existing scale of the need to be met in Coldwaltham does not justify the size of the allocation being made. No additional criterion has been added to the policy to refer to its phasing to later 5 year periods as indicated as being necessary in the Major Development reports of 2015 and 2017. Coldwaltham scores poorly in the Authority's Settlement Facilities Assessment, September 2015. In this regard Coldwaltham does not appear to be a location suitable to meet wider housing needs and provision should be limited to meet specific local needs only. | <p>I: The site is one of only two in the National Park that were judged in the Sustainability Appraisal to have a likely adverse effect on the landscape, which is of high sensitivity in the Arun Valley. R: The Authority is aware of the likely adverse effect on the landscape, but think that on balance the benefits of the scheme outweigh this effect.</p> <p>I: There are a significant number of ecological factors attached to this field. R: The ecological appraisal of the site commissioned by the Authority has found that the site lacks an assemblage of notable plant species and the proposed development would not remove a Section 41 Habitat of Principal Importance. A number of proposed enhancements that could be secured through the Meadow Management Plan will greatly outweigh the negative impact of losing a relatively small area of semi-improved grassland. These enhancements would secure net biodiversity gain.</p> <p>I: The Village Plans of 2004 and 2014 rejected large scale development as there is very limited infrastructure, public transport or employment opportunities. R: The Authority considers that the draft allocation is a suitable site the development of which will deliver multiple benefits to the village such as new open space, net biodiversity gain on the open space, a shop for the village and a substantial number of affordable homes.</p> <p>I: The A29 is a very busy, signposted 'trunk road' which carries traffic between the South Coast, via Gatwick and Horsham. Any further access roads from significant housing locations will add to traffic and accident risks, especially at morning and evening peak hours. R: The Site Allocations Highway Assessment Additional Site Assessments (SS04 and SS04a) documents published as part of the Core Document Library concluded that the site had 'easy access on to the A29 with good visibility in both directions' and rated the site as 'good.'</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> • The provision of 50% affordable housing may not be viable on this site. • The Trusts have seen no published evidence by the Authority as to the likely market interest/viability of a shop in this location • The Trusts welcome, in principle, suitable recreational provision which would help ease recreational pressures on more sensitive habitats, but has seen no analysis to assess whether the size/location/design of the proposed open space would actually fulfil that purpose. The Trusts fear that the opposite may be the case - increased recreational pressures from the additional housing and because the provision of parking and additional open space makes the general location more attractive to walkers. • Paragraph 9.54 of the Plan refers to links to the wider countryside which would only serve to facilitate increased access to the Trust's reserve. There is already recreational disturbance on the site, particularly from dog walkers. It should be noted that the owner of the allocated site has recently put a gate into the southern edge of the field due to the fence being repeatedly cut, presumably by dog walkers to allow more direct access into Waltham Brooks from the existing housing on Brooklands Way. • The provision of Suitable Alternative Natural Green Space (SANGs) is a now a well-established mitigation strategy where development may adversely impact protected habitats. However, SANGs need to be of substantial scale and carefully designed to ensure that they provide an attractive alternative to the sensitive natural habitat to be protected. The modest size of the open space proposed in policy SD64 raises doubt as to its likely effectiveness. The Trust would welcome a comprehensive approach to this | <p><i>I: This development is extremely upsetting locally. It will result in the coalescence of Coldwaltham and Watersfield and destroy a beautiful view of the South Downs from the A29.</i></p> <p>R: The residual part of the site to be retained as open space and another further field will prevent the coalescence of the two villages. The Authority is aware of the likely adverse effect on the landscape, but think that on balance the benefits of the scheme outweigh this effect.</p> <p><i>I: The Trusts have seen no published evidence which has assessed the biodiversity value/potential of the allocated land itself.</i></p> <p>R: Phase 1 and 2 ecological surveys have been commissioned and completed following the advice of Natural England and the Sussex Wildlife Trust. This study provides comprehensive ecological evidence on both the biodiversity value and potential of the site.</p> <p><i>I: Although the Sussex Wildlife Trust has not surveyed the site, a quick visual inspection by their Senior Ecologist has suggested that the site is at least a semi-improved hay meadow, with potential for pockets of acidic grassland flower-rich hay-meadow. An ecological survey carried out by an appropriately qualified ecologist is required.</i></p> <p>R: The Phase 1 and 2 Ecological Surveys found that the field was a category MG6b semi-improved grassland. The meadow is not unimproved lowland meadow. The plant species found within the meadow are all widespread and common species in the lowlands and often sown as a species rich sward on verges.</p> <p><i>I: The landowner has been in receipt of public funds to create beneficial grassland habitat and this should be weighed in the overall balance of considerations as to whether an allocation is justified.</i></p> <p>R: The Phase 1 and 2 Ecological Surveys noted that the grassland is in Higher Level Stewardship and no longer receiving nutrient inputs. It recommended that it be converted from a semi-improved grassland type to lowland meadow Habitat</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>issue and currently views the benefits of this element to be uncertain.</p> <ul style="list-style-type: none"> There is doubt as to whether the open space will be delivered as part of the housing development. The SDNPA therefore requires evidence to demonstrate that the new housing would have an unacceptable impact without the open space proposed. <p>The Barlavington Estate commented as follows:</p> <ul style="list-style-type: none"> Supports and welcomes the allocation. The site is well related to the existing built form and would not result in the coalescence of settlements. It would not cause adverse harm to the landscape. The housing figure should be given as a minimum rather than a range. The reference to ‘open countryside’ to the north in criterion 2b should be deleted as this land is wooded. Supports the improvements to the public realm in criterion 2j and the removal of the chain fence but notes that this is not within the ownership of the Barlavington Estate. Supports the concept plan, but notes that this is for illustrative purposes only. With suitable measures for the protection of off-site SPA, SACs and SSSIs and habitat retention, creation and enhancement, no reduction in the ecological interest of the site or its surrounds is likely to arise as a result of the site’s development. The site can be safely accessed off the A29. There are no impediments to delivery and it can be developed in the early part of the plan period. Does not support this allocation as the site abuts the Waltham Brooks SSSI and is close to an SPA and a Ramsar | <p>of Principal Importance. This would be in keeping with the objectives of the Sussex lowland meadow Habitat Action Plan.</p> <p>I: The existing scale of the need to be met in Coldwaltham does not justify the size of the allocation being made. R: The allocation is in line with the spatial strategy for a medium level of development to be dispersed across the towns and villages of the National Park.</p> <p>I: No additional criterion has been added to the policy to refer to its phasing to later 5 year periods as indicated as being necessary in the Major Development reports of 2015 and 2017. R: The Authority does not consider that this allocation constitutes major development as defined by national policy or Policy SD3 of this Local Plan as it does not have the potential to have a serious adverse impact on the natural beauty, wildlife or cultural heritage of, or recreational opportunities provided by, the National Park. Therefore there is no need for the development to be phased.</p> <p>I: Coldwaltham scores poorly in the Authority’s Settlement Facilities Assessment, September 2015. In this regard Coldwaltham does not appear to be a location suitable to meet wider housing needs and provision should be limited to meet specific local needs only. R: The allocation is in line with the spatial strategy for a medium level of development to be dispersed across the towns and villages of the National Park.</p> <p>I: The provision of 50% affordable housing may not be viable on this site. R: The development of the site will be subject to Policy SD28: Affordable Homes.</p> <p>I: The Trusts have seen no published evidence by the Authority as to the likely market interest/viability of a shop in this location. R: This is a matter that will be addressed at the application stage.</p> |

Policy SD64: Land South of London Road, Coldwaltham

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>site which are low lying. Development would impact on landscape quality and threaten biodiversity in this part of the National Park (CPRE Sussex and South Downs Society)</p> <ul style="list-style-type: none"> • The site at Barlavington Way, Midhurst scores higher in the Settlement Facilities Study and performs better in the Sustainability Appraisal (ICS Estates) • The site is in proximity to the Waltham Brooks SSSI, part of the Arun Valley SPA and Ramsar site. The development is likely to increase recreational pressure on the designated sites significantly and, notwithstanding the conclusions of the HRA, we remain concerned that it cannot be demonstrated that there will not be an adverse impact on the integrity of the Natura 2000 site. The land in question is of high environmental value in its own right, having been managed under agri-environment measures as a flower-rich meadow (RSPB) <p>The Coldwaltham Meadow Conservation Group (CMCG) commented as follows:</p> <ul style="list-style-type: none"> • The allocation is contrary to Policy SD1: Sustainable Development as the presumption in favour of sustainable development does not apply to this site. • The allocation is contrary to Policy SD2: Ecosystem Services as it does not include ecosystem services symbols, it cannot provide more, better and more joined up natural habitats and it cannot improve the National Park's resilience to and mitigation of climate change. • The allocation is contrary to Policy SD3: Major Development as there are no exceptional circumstances and there is no public interest justification. | <p>I: The Trusts welcome, in principle, suitable recreational provision which would help ease recreational pressures on more sensitive habitats, but has seen no analysis to assess whether the size/location/design of the proposed open space would actually fulfil that purpose. The Trusts fear that the opposite may be the case - increased recreational pressures from the additional housing and because the provision of parking and additional open space makes the general location more attractive to walkers.</p> <p>R: The Authority understands the need to balance the recreational use of the residual area with the need to retain and enhance the existing biodiversity value of the site. This reflected in amendments to criteria 1 and 2 (b) and (c) of the Policy set out in the Schedule of Changes. The Meadow Management Plan will ensure that the enhancements to biodiversity take place.</p> <p>I: Paragraph 9.54 of the Plan refers to links to the wider countryside which would only serve to facilitate increased access to the Trust's reserve. There is already recreational disturbance on the site, particularly from dog walkers. It should be noted that the owner of the allocated site has recently put a gate into the southern edge of the field due to the fence being repeatedly cut, presumably by dog walkers to allow more direct access into Waltham Brooks from the existing housing on Brooklands Way.</p> <p>R: Possible mitigation measures are set out in the supporting text (paragraph 9.48) in the Schedule of Changes.</p> <p>I: There is doubt as to whether the open space will be delivered as part of the housing development. The SDNPA therefore requires evidence to demonstrate that the new housing would have an unacceptable impact without the open space proposed.</p> <p>R: The Phase 1 and 2 Ecological Surveys demonstrate that, from an ecological perspective, this development would not impact on the nearby Waltham Brooks / Arun Valley site due to the nature of the site being very different i.e. dry meadow rather than wetland grazing marsh. The site is not suitable for waders and wildfowl, nor does it support any ditches.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> • The allocation is contrary to Policy SD4: Landscape as the development will be an obtrusive blot on the landscape, visible for miles. • The allocation is contrary to Policy SD6: Safeguarding Views as the development would block and spoil key views within the National Park. • The allocation is contrary to Policy SD8: Dark Night Skies as the site is located in the Dark Sky Core. • The allocation is contrary to Policy SD9: Biodiversity and Geodiversity as the development would spoil one of the most biodiverse areas in the National Park. • The allocation is contrary to Policy SD10: International Sites as the site is identified as supporting habitat for barbastelle bats from the Mens SAC. There is no evidence of IROPI that would justify the level of disturbance that the allocation would cause. • The allocation is contrary to Policy SD12: Historic Environment as the allocation fails to recognise the meadow as a heritage asset. • The allocation is contrary to Policy SD19: Transport and Accessibility as the allocation is not designed to minimise the need to travel. • The allocation is contrary to Policy SD22: Parking Provision as the proposed amenity car park will increase traffic in Brook Lane, which is a historic rural road. The new car park will also increase recreational disturbance at the nature reserve. • The allocation is contrary to Policy SD23: Sustainable Tourism as the development will remove the opportunity for people to increase their awareness and understanding of this biodiverse cultural heritage asset, which embodies all seven special qualities of the National Park. | <p>I: The housing figure should be given as a minimum rather than a range. R: The Authority considers it appropriate within a nationally protected landscape to set housing figures as ranges rather than minimums.</p> <p>I: The reference to ‘open countryside’ to the north in criterion 2b should be deleted as this land is wooded. R: The policy is talking here in broad landscape terms and differentiating between residential and undeveloped land.</p> <p>I: The site is in proximity to the Waltham Brooks SSSI, part of the Arun Valley SPA and Ramsar site. The development is likely to increase recreational pressure on the designated sites significantly and, notwithstanding the conclusions of the HRA, we remain concerned that it cannot be demonstrated that there will not be an adverse impact on the integrity of the Natura 2000 site. The land in question is of high environmental value in its own right, having been managed under agri-environment measures as a flower-rich meadow. R: The Phase 1 and 2 Ecological Surveys demonstrated that, from an ecological prospective, this development would not impact on the nearby Waltham Brooks / Arun Valley site due to the nature of the site being very different i.e. dry meadow rather than wetland grazing marsh. The site is not suitable for waders and wildfowl, nor does it support any ditches.</p> <p>I: The allocation is contrary to Policy SD1: Sustainable Development as the presumption in favour of sustainable development does not apply to this site. R: The allocation is in line with the spatial strategy for a medium level of development to be dispersed across the towns and villages of the National Park. Further information on the settlement strategy is set out in documents SS01 and SS02 of the Core Document Library.</p> |

Policy SD64: Land South of London Road, Coldwaltham

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> The allocation is contrary to Policy SD25: Development Strategy as it is not of a scale and nature appropriate to the character and function of Coldwaltham in terms of its facilities and services. The allocation is undeliverable. The appraisal of likely significant effects in the SA is unjustified. The HRA is deeply flawed. <p>The Wiggonholt Association commented as follows:</p> <ul style="list-style-type: none"> Objected to the previous allocation in the Preferred Options. The development would have an unacceptably adverse impact on the landscape of the National Park The development is major development which should not be allowed in a National Park. Clarity is required on the new parking area and access to the Arun Valley Criticised the consultation on the proposed site. It is a greenfield site and development on brownfield land should be prioritised <p>Individuals</p> <ul style="list-style-type: none"> The development will result in the loss of a beautiful and rare flower-rich meadow (several) The development would impact adversely on the landscape particularly from the higher land south of Amberley and from the South Downs Way (several) The beautiful view glimpsed from the A29 would be lost (several) | <p>I: The allocation is contrary to Policy SD2: Ecosystem Services as it does not include ecosystem services symbols, it cannot provide more, better and more joined up natural habitats and it cannot improve the National Park's resilience to and mitigation of climate change.</p> <p>R: The specific policy criteria relating to ecosystem services were not set for this policy as the analysis done using Ecoserv maps did not identify multiple ecosystem services in the locality for which policy requirements were required.</p> <p>I: The allocation is contrary to Policy SD3: Major Development as there are no exceptional circumstances and there is no public interest justification.</p> <p>R: The Authority does not consider that this allocation constitutes major development as defined by national policy or Policy SD3 of this Local Plan as it does not have the potential to have a serious adverse impact on the natural beauty, wildlife or cultural heritage of, or recreational opportunities provided by, the National Park.</p> <p>I: The allocation is contrary to Policy SD4: Landscape as the development will be an obtrusive blot on the landscape, visible for miles.</p> <p>R: The Authority is aware of the likely adverse effect on the landscape, but think that on balance the benefits of the scheme outweigh this effect.</p> <p>I: The allocation is contrary to Policy SD8: Dark Night Skies as the site is located in the Dark Sky Core.</p> <p>R: The site is not located in the Dark Sky Core (EO), but in zone E1. This has been clarified in the Schedule of Changes. The application will need to comply with Policy SD8: Dark Night Skies.</p> <p>I: The allocation is contrary to Policy SD9: Biodiversity and Geodiversity as the development would spoil one of the most biodiverse areas in the National Park.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> • Other smaller sites have been proposed for development and should be developed instead (several) • This is one of two meadows between Coldwaltham and Watersfield and this development would result in the coalescence of these settlements (several) • The development constitutes major development and as there are no exceptional circumstances and it is not in the public interest it should be refused (several) • The scale of the development is disproportionate to the size of the village and the services it provides (several) • Fair and proper consultation has not taken place in regard to this site as it was not included in the Preferred Options version of the Local Plan (several) • Coldwaltham has been disadvantaged by not preparing a neighbourhood plan (several) • There is a clear conflict of interest in regard to Sir Sebastian Anstruther, who owns the Barlavington Estate and his role as a prominent member of the SDNPA (several) • The development is contrary to Policies SD4: Landscape and SD6: Safeguarding Views (several) • The site currently has no public access and if the open space was opened up in line with the policy it would create an accessible natural greenspace. Local people including school people could become involved in looking after the meadow • If the site is not allocated the whole field could be ploughed up for cereal production • The alternative sites put forward by the CMCG are made up of medieval assarts bordered by veteran oaks and ancient hedgerows (several) • The alternative sites put forward by the CMCG host a number of protected species including Soprano Pipistrelle Bats (several) | <p>R: The Phase 1 and 2 Ecological Surveys demonstrate that a net biodiversity gain can be achieved on the site, which will be secured through a Meadow Management Plan.</p> <p><i>I: The allocation is contrary to Policy SD10: International Sites as the site is identified as supporting habitat for barbastelle bats from the Mens SAC. There is no evidence of IROPI that would justify the level of disturbance that the allocation would cause.</i></p> <p>R: The HRA Report, page B-91, identifies that the site is potential supporting habitat, in particular, for commuting routes, for Barbastelle bats of the Mens SAC. The meadow field is not particularly suitable for foraging by bats due to its relatively small size. It is the linear vegetation at the margins of the site for commuting through the landscape which are of more relevance. As outlined in the allocation policy, a large part of the meadow is to be retained and enhanced, and as such it is entirely possible that the key boundary features can be preserved. An application for the development of the site would be required to demonstrate how the site's role for providing habitat suitable for commuting bats will be conserved and enhanced as per Policy SD10: International Sites.</p> <p><i>I: The allocation is contrary to Policy SD12: Historic Environment as the allocation fails to recognise the meadow as a heritage asset.</i></p> <p>R: The allocation is not a heritage asset.</p> <p><i>I: The allocation is contrary to Policy SD19: Transport and Accessibility as the allocation is not designed to minimise the need to travel.</i></p> <p>R: Due to poor public transport provision in rural areas it is not possible to allocate sites only in accessible areas.</p> <p><i>I: The allocation is contrary to Policy SD22: Parking Provision as the proposed amenity car park will increase traffic in Brook Lane, which is a historic rural road. The new car park will also increase recreational disturbance at the nature reserve.</i></p> |

Policy SD64: Land South of London Road, Coldwaltham

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> • The development of this site is contrary to four of the National Park's special qualities. • The Arun Valley is one of the most beautiful and biodiverse areas in the National Park, and the Meadow is one of its most colourful components. • There is a small, but vociferous, pressure group that are determined to prevent any development taking place on SD64. • The alternative sites proposed by the CMCG are unsuitable for development due to problems with access and the presence of protected species (several) • The table that has been produced comparing the alternative sites proposed by the CMCG is inaccurate, factually incorrect and manipulative. • The proposed allocation offers the benefits of a shop, enhanced play facility and access to the meadow. • The Prince of Wales is leading a campaign to save and create wildflower meadows and so this one should not be destroyed. • The proposed site is the most suitable site in the village for development and would provide net gains such as a car parking for visitors. • The CMPG have resorted to publishing false and misleading information on their website in an attempt to whip up support for displacing the entire housing allocation to other sites within the village. • The alternative sites suggested by the CMPG have only recently been put forward and each of them would, if developed, have serious adverse effects on wildlife, biodiversity, landscape value and cultural heritage including the setting of two conservation areas and several listed buildings. There has been no objective assessment of these | <p>R: The proposed new car park has been deleted in the Schedule of Changes in response to concerns on increased recreational disturbance. A small parking area would be required to serve the new shop.</p> <p>I: The allocation is contrary to Policy SD23: Sustainable Tourism as the development will remove the opportunity for people to increase their awareness and understanding of this biodiverse cultural heritage asset, which embodies all seven special qualities of the National Park.</p> <p>R: The Authority is aware of the likely adverse effect on the landscape, but think that on balance the benefits of the scheme outweigh this effect.</p> <p>I: The allocation is contrary to Policy SD25: Development Strategy as it is not of a scale and nature appropriate to the character and function of Coldwaltham in terms of its facilities and services.</p> <p>R: The allocation is in line with the spatial strategy for a medium level of development to be dispersed across the towns and villages of the National Park.</p> <p>I: The allocation is undeliverable.</p> <p>R: The landowner confirmed in his representation to the Local Plan that there are no impediments to delivery and it can be developed in the early part of the plan period.</p> <p>I: The appraisal of likely significant effects in the SA is unjustified.</p> <p>R: The SA has been prepared in line with the relevant regulations. It did duly flag up the potential adverse impact on the landscape through the development of this site.</p> <p>I: The HRA is deeply flawed.</p> <p>R: The HRA has been prepared in line with the relevant regulations. It has duly considered the impact of the site's development on the neighbouring international nature designations and the recommended changes were incorporated into the allocation at the Pre-Submission stage.</p> |

Policy SD64: Land South of London Road, Coldwaltham

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>alternative sites and it is difficult to see how any could now be carried out within the necessary timescales.</p> <ul style="list-style-type: none"> • There is much local concern about this site being a flower meadow but it should be noted that this concern has only arisen because of the development plans. Previously the site was just seen as an agricultural field and its importance to the village has been grossly inflated. • The impact of development on dark night skies and dark night skies would be much greater at the other sites proposed by the CMPG than the proposed allocation site. • The proposed new access to SD64 would help to slow down traffic on the A29. • The SDNPA should meet with the parish council to discuss the allocation and the alternatives put forward by the CMPG. • The site is an extremely rare hay meadow of which only 3% survive in the UK. • New homes should be built on brownfield sites such as Shoreham Cement Works rather than greenfield sites. • Adverse impact on neighbouring properties. • Does a simple wild flower meadow count for nothing in the face of the developer and his pockets? • Do not believe that the CMCG's campaign represents the views or interests of the village as a whole. • The comparison table published by the CMCG is flawed and misleading. Of the various sites proposed, the SD64 site (site 1) is the most suitable for development. There would be serious problems with developing the other sites including significant extension of the settlement boundary, access issues, impact on ancient landscapes, ecological concerns, the visual impact on the landscape and conflict with the precedence set by previous planning decisions | <p><i>I: It is a greenfield site and development on brownfield land should be prioritised.</i> R: The Local Plan has prioritised the allocation of previously developed land for development. However, it has been necessary to allocate some greenfield sites in order to provide a medium level of development dispersed across the town and villages of the National Park.</p> <p><i>I: The development will result in the loss of a beautiful and rare flower-rich meadow.</i> R: Although the field is very pretty when in summer when the flowers are in full bloom, the Phase 1 and 2 Ecological Surveys have confirmed that the meadow is not unimproved lowland meadow. The plant species found within the meadow are all widespread and common species in the lowlands and often sown as a species rich sward on verges.</p> <p><i>I: The scale of the development is disproportionate to the size of the village and the services it provides.</i> R: The allocation is in line with the spatial strategy for a medium level of development to be dispersed across the towns and villages of the National Park. The development will support the primary school where there are falling pupil numbers and provide a shop for the village.</p> <p><i>I: The SDNPA should meet with the parish council to discuss the allocation and the alternatives put forward by the CMPG.</i> R: The Authority has met with Coldwaltham Parish Council on a number of occasions to discuss the site.</p> <p><i>I: Adverse impact on neighbouring properties.</i> R: The Authority does not consider that the development would have an adverse impact on the amenity of neighbouring properties.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD65: Land East of Warnford Road, Corhampton

There were a total of **2** representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National Agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u> No comments received.</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> The matching of its housing allocation to existing planning consents is welcomed (Corhampton & Meonstoke Parish Council). <p><u>Other organisations</u></p> <p>Portsmouth Water: The nature of the location of the site may result in contamination of groundwater. Development at this site is asked to be required to incorporate solution features as a key component of the associated hydrogeological risk assessment to ensure groundwater protection. In addition Portsmouth Water wish to be consulted on such risk assessments (Portsmouth Water).</p> <p><u>Individuals</u> No comments received.</p> | <p><i>I: The nature of the location of the site may result in contamination of groundwater.</i></p> <p>R: The allocation site is subject to existing planning permission which has already addressed this matter. The allocation has since been deleted from the Local Plan as development is now well advanced, as set out on page 31 and 32 of the submitted Schedule of Changes.</p> |

Policy SD65: Land East of Warnford Road, Corhampton

Summary of Issues and Responses

Policy SD66: Land at Park Lane, Droxford

There were a total of 10 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u></p> <p>Historic England: Welcome and support the descriptions of historic environment as part of the positive strategy for the conservation and enjoyment, and a clear strategy for enhancing the historic environment. Also welcome reference to Historic Impact Assessment and/or archaeological assessment. However, Historic England would prefer to see specific reference to Heritage Impact Assessment or Archaeological Assessment or both, with important archaeological remains or other historic features retained in situ wherever possible, or, where not possible, recorded for deposition within a public archive.</p> <p>Portsmouth Water: Site has no mapped karstic features recorded by BGS records nor by LIDAR analysis, however this does not rule out their existence.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> • Welcome point 2.g) of the policy which seeks to prevent no significant harm to the amenity of the route. This will require careful attention to the vehicular access to the site. (Hampshire CC) <p><u>Parish and Town Councils</u></p> | <p><i>I: Prefer to see specific reference to Heritage Impact Assessment or Archaeological Assessment or both, with important archaeological remains or other historic features retained in situ wherever possible, or, where not possible, recorded for deposition within a public archive.</i> R: It is considered that the policy criteria plus supporting text, combined with the historic environment policies in the Local Plan are sufficient. Policy SD12: Historic Environment requires submission of a Heritage Statement with all applications proposing development that may affect a heritage asset (whether designated or non-designated). Policy SD16: Archaeology requires this statement to contain sufficient information to assess the significance of any archaeological asset and the effect on the significance of that asset.</p> <p><i>I: Harmful impact on historic core</i> R: Criterion 2(a) requires the conservation and enhancement of the setting of local heritage assets including Droxford Conservation Area. Heritage Statement and Archaeological Assessment are set out in the list of evidence studies in paragraph 9.67.</p> <p><i>I: Removal of vegetation required for access and visibility</i> R: The requirements for an Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan are set out in the list of evidence studies in paragraph 9.67. Criterion 3(a) requires proposals to address the protection and enhancement of hedgerows and trees within the site where possible and where they are lost, provide at least the equivalent in new planting on site.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> The following errors are identified: incorrect road name reference, days bus service operative. (Droxford PC) <p>Other organisations</p> <ul style="list-style-type: none"> There are concerns over the site allocation that points to land at Union Lane being better suited for development. These include harmful impact on historic core, removal of vegetation required for access and visibility, and adverse impact on amenity of the Wayfarers Walk long distance footpath. SHLAA is flawed and contradictory. (Bargate Homes) The proposed allocation of Land at Park Lane, Droxford should be deleted and the land south of Barlavington Way, Midhurst should be allocated for development instead. (ICS Estates Ltd.) Site should be reassessed to ensure that the existing biodiversity value has been properly considered. Policy should be reworded to ensure a consistent approach to assessments and net gains, with all allocations including a requirement for up-to-date ecological information and conservation and enhancement of biodiversity. (Sussex/Hampshire Wildlife Trust) <p>Individuals</p> <ul style="list-style-type: none"> There is already rush hour traffic and traffic associated with school runs on the access roads to the site, which are too narrow to cope with traffic levels. The Park Lane site may be only part of the Droxford housing solution. Support in principle inclusion of the site. Suggest information box is relocated to be consistent with other allocation policies. 26 to 32 dwellings is unduly restrictive. | <p>I: Adverse impact on amenity of the Wayfarers Walk long distance footpath. R: Criterion (g) requires no significant harm to the amenity of the Wayfarers Way. The Wayfarers Way long distance footpath is added to the constraints text book of the policy as set out on page 32 of the submitted Schedule of Changes.</p> <p>I: Site should be reassessed to ensure that the existing biodiversity value has been properly considered. Policy should be reworded to ensure a consistent approach to assessments and net gains, with all allocations including a requirement for up-to-date ecological information and conservation and enhancement of biodiversity R: The site has been assessed for its biodiversity through the Strategic Housing Land Availability Assessment (SHLAA TSF10), as part of landscape assessments, and through Ecoserve (ecosystem services) modelling. The policies of the Local Plan should be read together. Policy SD9 and supporting text (in particular paragraph 5.72) sets out requirements for all development to conserve and enhance biodiversity, and to provide appropriate information and evidence on potential impacts to wildlife sites. The policy criteria plus supporting text, combined with the biodiversity policies in the Local Plan are considered to be sufficient.</p> <p>I: Rush hour traffic and traffic associated with school runs on the access roads to the site, which are too narrow to cope with traffic levels R: Criteria 2(c) and (d) require safe pedestrian and vehicular access and egress, dependant off-site highways improvements to be secured by planning obligations and provision of all necessary vehicular parking on-site to avoid additional on street parking on local roads. The evidence studies set out in paragraph 9.67 include Highways Assessment and Transport Assessment. The following changes are set out on page 32-33 of the submitted schedule of changes:</p> |

Policy SD66: Land at Park Lane, Droxford

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>The site is large and regularly shaped, therefor provides opportunity for at least 35 homes.</p> | <ul style="list-style-type: none"> - Wording amendment to paragraph 247 to make reference to the junior school and to state that the precise number and type of homes should be informed by highways evidence to ensure safe access. - Wording amendment to criteria 1 to change the number of dwellings proposed from '26-32' to 'approximately 26' and 'provided that this level of development is supported by a Transport Assessment demonstrating that safe access can be achieved'. <p><i>I: 26 to 32 dwellings is unduly restrictive. The site is large and regularly shaped, therefor provides opportunity for at least 35 homes</i> R: The number of homes identified is based on a number of factors in addition to the shape of the site as mentioned in the representation. The number of homes identified is considered to strike the right balance of making the best use of land, and the various constraints and characteristics of the site and wider settlement of Droxford.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD67: Cowdray Works Yard, Easebourne

There were a total of 10 responses to this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies and utility providers</u></p> <p>Historic England: Welcome and supports paragraph 1 of Policy SD67 as part of the positive strategy for the conservation and enjoyment, and a clear strategy for enhancing the historic environment. However, Historic England would prefer to see reference to Heritage Impact Assessment or Archaeological Assessment or both, with important archaeological remains or other historic features retained in situ wherever possible, or, where not possible, recorded for deposition within a public archive.</p> <p>Southern Water: Assessment reveals that additional local water and sewerage infrastructure would be required to accommodate the proposed development (involving making a connection to the water and sewerage networks at the nearest points of adequate capacity). Request that the need for additional infrastructure at specific sites is recognised within the policy.</p> <p><u>Borough, City, County and District Councils</u></p> <p>No comments received.</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Easebourne Parish Council has made the following comments: <ul style="list-style-type: none"> Support the principle of allocating the site. Inclusion of the site in the revised settlement boundary is inappropriate, as it allows for potential backland/infill development should the initial scheme fall short of the site boundaries. | <p><i>I: Historic England would prefer to see reference to Heritage Impact Assessment or Archaeological Assessment or both.</i> R: Policy SD12: Historic Environment requires submission of a Heritage Statement with all applications proposing development that may affect a heritage asset (whether designated or non-designated). Policy SD16: Archaeology requires this statement to contain sufficient information to assess the significance of any archaeological asset and the effect on the significance of that asset.</p> <p><i>I: Request reference to need to connect to water and sewerage network.</i> R: This is considered to be a detailed matter to be dealt with at the development management stage.</p> <p><i>I: Concerns over revised settlement boundary (allows for inappropriate infill on the site); density of built development; inadequate access; increase in traffic; request development brief.</i> R: The site is previously developed, well-related to the existing settlement and with a good access, and therefore inherently suitable for development. Policy SD67 is designed to ensure an appropriate scale of mixed-use development,</p> |

Policy SD67: Cowdray Works Yard, Easebourne

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> ○ Previous consultations did not identify the site, as such there has been no opportunity previously for representations to be made. ○ The proposed density is out of context with the density and character of the village, and would result in unacceptable harm and impact to the conservation area, landscape setting, biodiversity and (cumulatively with other allocated sites) heritage context. ○ Existing vehicular access is not appropriate, exacerbated by the limited pedestrian access on the relevant side of the road. Request highways assessment. ○ Object to likely increase in traffic in relation to residential and commercial development. ○ Parish Council and community should be consulted on the new footpath proposed. ○ Seek further security for developer contributions for on- and off-site highways infrastructure. ○ Request a development brief to be developed, and a concept master plan to be consulted on with the Parish Council and community. <p>Other organisations</p> <ul style="list-style-type: none"> ● Site is wholly owned by Cowdray Estate which strongly supports allocation as mixed use. Capacity of the site should be expressed as ‘approximately 20 dwellings and approximately 1,500sqm of commercial floorspace’. (Cowdray Estate) ● Site should be reassessed to ensure that the existing biodiversity value has been properly considered. Policy should be reworded to ensure a consistent approach to assessments and net gains, with all allocations including a requirement for up-to-date ecological information and conservation and enhancement of biodiversity. (Sussex/Hampshire Wildlife Trust) ● Allocation would put strain on congested and polluted road leading south to and through Midhurst. Traffic easing measures required. Any industrial processes should not cause excessive noise, vibrations or pollution. (The Midhurst Society) | <p>with regard to the opportunities and constraints presented by the site. A development brief is not considered necessary for this site at the current time.</p> <p>I: Capacity of the site should be expressed as ‘approximately 20 dwellings and approximately 1,500sqm of commercial floorspace’. R: The quantum of development proposed in the policy is considered appropriate for this site.</p> <p>I: Site should be reassessed to ensure that the existing biodiversity value has been properly considered. R: Policy SD9 and supporting text (in particular paragraph 5.72) sets out requirements for all development to conserve and enhance biodiversity, and to provide appropriate information and evidence on potential impacts to wildlife sites.</p> <p>I: Allocation would put strain on congested and polluted road leading south to and through Midhurst. R: The allocation is for a modest amount of housing. A transport assessment has been undertaken for the overall distribution and amount of development, which takes account of Easebourne and Midhurst allocations (see PCP 01 Transport Background Paper, PCP 03 Local Plan Transport Assessment and PCP 06 Midhurst and Petersfield junctions). These concluded that with appropriate mitigation, the additional housing can be delivered with minimal additional impact, albeit pressure on local roads and junctions will arise from general traffic increases and development originating outside of the National Park.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p><u>Individuals</u></p> <ul style="list-style-type: none">• New infrastructure, affordable housing, retail may benefit Easebourne.• Density of housing is too high. Development should preserve and if possible enhance character.• Little provision for affordable housing.• Additional traffic will join congestion on A272 / A286 and add pressure to parking in Midhurst. Concerns over road safety and lack of pavements.• School and surgery in Easebourne are over-stretched / oversubscribed.• Concern over pressure on water supplies, drainage, energy supplies, internet speeds, telecommunications.• Where will new residents find employment? Issue of out-commuting. | |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD68: Land at Egmont Road, Easebourne (incorporating comment on Easebourne preamble)

There were a total of 10 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u></p> <p>Historic England: Welcome and supports paragraph 1 of Policy SD67 as part of the positive strategy for the conservation and enjoyment, and a clear strategy for enhancing the historic environment.</p> <p>Southern Water: Assessment reveals that additional local sewerage infrastructure would be required to accommodate the proposed development (involving making a connection to the sewerage network at the nearest points of adequate capacity). Request that the need for additional infrastructure at specific sites is recognised within the policy.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Support, subject to satisfactory Road Safety Audits being carried out prior to the Local Plan Examination. (West Sussex County Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Easebourne Parish Council has made the following comments: <ul style="list-style-type: none"> New built form in this area will impact on Grade II listed buildings and the conservation area Site boundary should be redrawn to allow buffer zone to the east of the boundary 20 dwellings represents too high density; capacity is less than 14 | <p><i>I: Request reference to need to connect to water and sewerage network.</i> R: This is considered to be a detailed matter to be dealt with at the development management stage.</p> <p><i>I: Concern over impact on listed buildings; there is a need for a buffer zone; number of homes should be lower (14 not 20); over-use on existing car park; inadequate access; request stronger wording to secure developer contributions. Site layout should be provided and site brought forward through a Whole Estate Plan.</i> R: The site is well-related to the existing settlement and with good potential for access, and therefore suitable for development. Policy SD67 is designed to ensure an appropriate scale of mixed-use development, which makes efficient and appropriate use of land, and has regard to the opportunities and constraints presented by the site (including adjacent heritage assets). It is not necessary to include detailed wording on planning obligations which is set out in other Local Plan policies. The SDNPA encourages Whole Estate Plans, however WEPs are not part of the development plan therefore the allocation of sites in the Local Plan is appropriate.</p> <p><i>I: The capacity of the site at this stage should be expressed as "approximately 20 dwellings".</i> R: The quantum of development proposed in the policy is considered appropriate for this site.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> ○ Over-use of the retained car park will be exacerbated ○ Access is inadequate to support level of development ○ A site layout should be undertaken to inform policy/access issues ○ Request wording to better secure developer contributions for highways and flood risk assessment ○ This and other sites should be brought forward via a Whole Estate Plan <p>Other organisations</p> <ul style="list-style-type: none"> • Strongly supports the allocation of the site. The capacity of the site at this stage should be expressed as "approximately 20 dwellings". (Cowdray Estate) • Site should be reassessed to ensure that the existing biodiversity value has been properly considered. Policy should be reworded to ensure a consistent approach to assessments and net gains, with all allocations including a requirement for up-to-date ecological information and conservation and enhancement of biodiversity. (Sussex/Hampshire Wildlife Trust) • Allocation would put strain on congested and polluted roads the A286 and A272. Traffic easing measures required. (The Midhurst Society) <p>Individuals</p> <ul style="list-style-type: none"> • Density of housing is too high. Developments should preserve and if possible enhance the character of the area. • Access via existing school playground is dangerous. • Adjacent land could be released if Conifers School were to move. • Additional traffic will join congestion on A272 / A286 and add pressure to parking in Midhurst. Concerns over road safety and lack of pavements. | <p>I: Site should be reassessed to ensure that the existing biodiversity value has been properly considered, and include a requirement for up-to-date ecological information and conservation and enhancement of biodiversity. R: Policy SD9 and supporting text (in particular paragraph 5.72) sets out requirements for all development to conserve and enhance biodiversity, and to provide appropriate information and evidence on potential impacts to wildlife sites.</p> <p>I: Allocation would put strain on congested and polluted roads the A286 and A272. Traffic easing measures required. R; The allocation is for a modest amount of housing. A transport assessment has been undertaken for the overall distribution and amount of development, which takes account of Easebourne and Midhurst allocations (see PCP 01 Transport Background Paper, PCP 03 Local Plan Transport Assessment and PCP 06 Midhurst and Petersfield junctions). These concluded that with appropriate mitigation, the additional housing can be delivered with minimal additional impact, albeit pressure on local roads and junctions will arise from general traffic increases and development originating outside of the National Park.</p> <p>I: Access via existing school playground is dangerous. R; The proposed access does not infringe upon or affect the school playground.</p> <p>I: Adjacent land could be released if Conifers School were to move. R: There is no known intention for the Conifers School to vacate their current site.</p> <p>I: Concern over parking and road safety.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> • Where will new residents find employment? Issue of out-commuting. • No mention of affordable housing. • 16-20 homes will overburden existing infrastructure. • With regard to Easebourne generally, no reference to evidence that additional/reinforced school places, medical services, drainage, electrical power, gas, telecommunications will be provided. No requirement for alternative energy sources such as solar and thermal panels, ground source heating, electric car charging, nor carbon-neutral development. | <p>R: Policy SD22: Parking Provision will ensure appropriate parking on development sites.</p> <p><i>I: There is no mention of affordable housing.</i> R: Affordable housing policy is set out in Policy SD28 and does not need to be repeated in each allocation policy.</p> <p><i>I: There is no requirement for additional/reinforced school places, medical services, drainage, electrical power, gas, telecommunications to be provided. There is no requirement for alternative [renewable] energy sources or electric car charging.</i> R: Policy SD42: Infrastructure sets out a policy framework ensuring that appropriate infrastructure will be provided. Policy SD22 requires electric car charging points where feasible. Policy SD48 requires all development to incorporate sustainable design features, and address climate change through zero/low carbon technologies.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD69: Former Easebourne School, Easebourne

There were a total of 13 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u> Historic England: Welcome and supports paragraph 1 of Policy SD67 as part of the positive strategy for the conservation and enjoyment, and a clear strategy for enhancing the historic environment.</p> <p>Southern Water: Assessment reveals that additional local sewerage infrastructure would be required to accommodate the proposed development (involving making a connection to the sewerage network at the nearest points of adequate capacity). Request that the need for additional infrastructure at specific sites is recognised within the policy.</p> <p><u>Borough, City, County and District Councils</u> No comments received.</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • Easebourne Parish Council has made the following comments: <ul style="list-style-type: none"> ○ Object to allocation of this site. It is majority greenfield land with a Grade II listed building. ○ The site provides a natural break in built form contributing to the setting of the conservation area. It is only considered deliverable if a visual gap through the centre of the site is retained. Development should be limited to the area of the existing school buildings. | <p><i>I: Request reference to need to connect to water and sewerage network.</i> R: This is considered to be a detailed matter to be dealt with at the development management stage.</p> <p><i>I: Object to allocation as it is greenfield; impacts on listed building; contributes to setting of conservation area; should sit outside settlement boundary; would result in an unacceptably low density; prejudices a future relocation of Conifers School; insufficient evidence of safe access; likely to increase local traffic. Request preparation of a development brief should development go ahead.</i> R: Whilst part of the site is greenfield, Policy SD69 makes clear that development is to be focused on the previously developed portion, including sensitive conversion of the existing listed building to ensure its future preservation. The number of homes proposed reflects the need to maintain a visual gap to open countryside, and allowing for an appropriate design that enhances the setting of the listed building. There is no known plan for re-use of the site for educational use, and it would not be appropriate to sterilise the site given it has been largely vacant for some years. The allocation is for a modest amount of housing which will have minimal impact on traffic movements; Policy SD22: Parking Provision will ensure appropriate on-site parking, and the Site Allocations Highway Assessment (SS 04) assesses the access arrangements as adequate. A</p> |

Policy SD69: Former Easebourne School, Easebourne

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> ○ Inclusion of the site in the revised settlement boundary is inappropriate, as it allows for potential backland/infill development should the initial scheme fall short of the site boundaries given public benefit is not outweighed by harm. ○ The proposed development of 20 dwellings would result in an unacceptably low density of 10 dwellings per hectare. ○ The option of Conifers School moving to the site should have been considered. ○ Previous consultations did not identify the site, as such there has been no opportunity previously for representations to be made. ○ No evidence that proposed access to site is safe. Object to likely increase in traffic in relation to residential development. ○ Request a development brief to be developed, and a concept master plan to be consulted on with the Parish Council and community. <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • Object to exclusion of small part of existing school site to north of school buildings. Capacity of the site should be expressed as 20 dwellings (including dwellings formed through conversion of the original school building). (Cowdray Estate) • Site should be reassessed to ensure that the existing biodiversity value has been properly considered. Policy should be reworded to ensure a consistent approach to assessments and net gains, with all allocations including a requirement for up-to-date ecological information and conservation and enhancement of biodiversity. (Sussex/Hampshire Wildlife Trust) • Allocation would put strain on congested and polluted roads the A286 and A272. Traffic easing measures required. (The Midhurst Society) | <p>development brief is not considered necessary for this site at the current time.</p> <p><i>I: Object to exclusion of small part of existing school site to north of school buildings. Capacity of the site should be expressed as 20 dwellings.</i></p> <p>R: The site boundary shown reflects a logical extension to the settlement boundary and built form (notwithstanding the need to maintain a visual gap). The quantum of development proposed in the policy is considered appropriate for this site, given its nature and the need to conserve and enhance heritage assets.</p> <p><i>I: Site should be reassessed to ensure that the existing biodiversity value has been properly considered, and include a requirement for up-to-date ecological information and conservation and enhancement of biodiversity.</i></p> <p>R: Policy SD9 and supporting text (in particular paragraph 5.72) sets out requirements for all development to conserve and enhance biodiversity, and to provide appropriate information and evidence on potential impacts to wildlife sites</p> <p><i>I: Allocation would put strain on congested and polluted roads the A286 and A272.</i></p> <p>R: The allocation is for a modest amount of housing. A transport assessment has been undertaken for the overall distribution and amount of development, which takes account of Easebourne and Midhurst allocations (see PCP 01 Transport Background Paper, PCP 03 Local Plan Transport Assessment and PCP 06 Midhurst and Petersfield junctions). These concluded that with appropriate mitigation, the additional housing can be delivered with minimal additional impact, albeit pressure on local roads and junctions will arise from general traffic increases and development originating outside of the National Park.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p><u>Individuals</u></p> <ul style="list-style-type: none"> • Conifers School in Egmont Road should move to this site such that it can continue in its current use. • Density too high. • Not enough provision for affordable housing. • Not practical to build on the site in transport / parking terms, due to nature of Easebourne Street e.g. no pedestrian walkways, hazardous farm traffic. • Should not treat whole site as former school grounds as most of it is greenfield. • Policy should be more prescriptive regarding line of visual gap. Should preserve views to open countryside. • Development will irrevocably change character, landscape, listed building and conservation area and lead to noise, light pollution and impact on infrastructure. | <p><i>I: There is not enough provision for affordable housing.</i> R: Affordable housing policy is set out in Policy SD28 and does not need to be repeated in each allocation policy.</p> <p><i>I: Concern over lack of pedestrian walkways.</i> R: The Schedule of Changes (SDNP 01.1) includes a requirement for a new footpath to be provided linking to Glaziers Lane to the west, which helps to address this issue. Notwithstanding this, there are a number of homes already established to the east and west along Easebourne Lane, and the site has previously been used as a school, hence the use of this quiet road by pedestrians is already well established.</p> <p><i>I: Policy should be more prescriptive regarding line of visual gap. Should preserve views to open countryside.</i> R: It is considered that the policy as drafted achieves this objective.</p> <p><i>I: Development will change character, landscape, listed building and conservation area and lead to noise, light pollution and impact on infrastructure.</i> R: It is considered that Policy SD69, together with a range of other Local Plan policies, will lead to the enhancement of character and heritage assets in this locality.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD70: Land behind the Fridays, East Dean, East Sussex

There were a total of 2 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National Agencies</u></p> <ul style="list-style-type: none"> No comments received. <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> No comments received. <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> No comments received. <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Consider remaining land to the west of SD70 (part of SHLAA ref. WE002) could accommodate additional development. Do not agree that Land adjoining The Vicarage, East of Gilberts Drive (SHLAA ref. WE001) should have been excluded from the SHLAA on the basis that it could not accommodate 5 or more dwellings as it is 1.56 hectares in size. Also do not agree that Land adjacent to the Village Hall, Gilberts Drive (SHLAA ref WE003), is unsuitable for development just because it is located within the conservation area. Suggest that a Small Sites Allocations document is prepared for sites that can accommodate fewer than 5 dwellings in East Dean. (The Gilbert Estate) | <p><i>I: Two sites (SHLAA ref. WE001 and WE003) should be allocated for development and that land adjacent to this allocation SD70 Land behind the Fridays, East Dean should accommodate additional development.</i></p> <p>R: The development of Land behind the Fridays, East Dean was granted planning permission for 11 dwellings in 2015 (SDNP/14/03936/FUL). The development has now been completed. It is therefore proposed in the Schedule of Changes to delete this policy allocation and its supporting text from the Local Plan (see page 33 of Schedule of Changes: Para Policy ref: 9.86 and 9.87).</p> <p>The SDNPA's Strategic Housing Land Availability Assessment (SHLAA) April 2016 (Core Document TFS10) provides an assessment of potential site availability. In terms of site SHLAA ref. WE001, this was excluded in the first stage of assessment and therefore not taken any further. As explained in the methodology to the SHLAA, sites are excluded from the assessment where the site does not have the potential to deliver 5 or more dwellings, taking into account opportunities and constraints on the site, as well as the site size, for example the potential impacts on landscape character of developing the whole site.</p> <p>The land adjacent to Land behind the Fridays was put forward for assessment in the SHLAA as part of SD70. This comprised the western (upper) part of the overall site and was rejected in the SHLAA. The SHLAA conclusion to this site in the explains that it is unsuitable for development due to its high landscape sensitivity comprising rising land and contributing to the countryside setting of the</p> |

Policy SD70: Land behind the Fridays, East Dean, East Sussex

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p><u>Individuals</u></p> <ul style="list-style-type: none"> The allocation policy is insufficiently detailed compared to other allocations and should be revised. | <p>village. The eastern (lower) part of the site (SD70) was considered suitable for development and taken forward as the allocation SD70.</p> <p>With regards to site SHLAA ref. WE003, the assessment in the SHLAA explains that this site is a significant open area within the conservation area, which has an important role, including as a buffer between the historic village and the surrounding residential development. The assessment concluded that development of this site would have a potential adverse impact on the character and appearance of the landscape and on heritage assets and was therefore not taken forward. The allocation and implementation of SD70 has meant that the settlement of East Dean has met its housing provision figure as set out in Local Plan policy SD26: Supply of Homes and there is no requirement to release further land for this purpose.</p> <p><i>I: Suggest that a Small Sites Allocations document is prepared for sites that can accommodate fewer than 5 dwellings in East Dean</i></p> <p>R: The National Planning Practice Guidance advises that SHLAA's should set a minimum threshold for the identification of sites i.e. those that are capable of delivering 5 or more dwellings. The Local Plan does not therefore allocate small sites that are below this threshold. However small sites may come forward as unidentified (windfall) sites and an allowance for this has been made the Local Plan housing delivery figures.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD71: Land at Elm Rise, Findon

There were a total of 8 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u> No comments received.</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Object to allocation. The Parish Council has set up a working party to review the current made Neighbourhood Plan which will include alternative and more landscape sensitive site allocations to meet the required 30 dwellings for Findon. (Findon PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Findon UNP Working Group: <ul style="list-style-type: none"> There are available, deliverable alternative sites with capacity to absorb small scale housing development of around 30 dwellings, in conformity with Policy SD26, where affordable homes to meet local housing need would be more viable, and that would have lower landscape value and sensitivity. These will be included in an updated Findon Neighbourhood Plan which is in the final stages of preparation. The site proposed for allocation is one of the lowest two ranked sites by a significant margin, from a survey of local residents which received 475 responses. | <p><i>I: There are available, deliverable alternative sites with capacity to absorb small scale housing development of around 30 dwellings, in conformity with Policy SD26, where affordable homes to meet local housing need would be more viable, and that would have lower landscape value and sensitivity. The site is one of two of the lowest ranked sites in a survey of local residents.</i></p> <p>R: The SDNPA is engaging with the emerging updated Findon Neighbourhood Plan, but disagrees with its conclusions with regard to the alternative sites proposed for allocation. The Sites and Settlements Route Map (SS 02) sets out the SDNPA's conclusions on alternative sites. In short, the two sites proposed for allocation in the South Downs Local Plan are considered to be the most suitable available and achievable sites to provide for the modest level of housing growth proposed for Findon.</p> <p><i>I: Proposed site density, scale and form would be out of character with existing built development. Most of the site is highly visible in the highly sensitive landscape from three viewpoints.</i></p> <p>R: Policy SD71 in the submission Local Plan is designed to ensure an appropriate scale of development, which makes efficient and appropriate use of land, and has regard to the opportunities and constraints presented by the site. Noting the concerns expressed, the Schedule of Changes (SDNP 01.1) includes a slight reduction in the number of homes, from 15-20 to 14-18.</p> |

Policy SD71: Land at Elm Rise, Findon

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> ○ Properties on the eastern and southern boundaries are at a very low density, therefore proposed development would be out of character with existing built development scale, form and density. ○ Most of the site is highly visible in the highly sensitive landscape from three viewpoints. ○ There are local problems with surface water runoff. Shallow soil over chalk does not lend itself to a SuDs design approach. ○ Stable Lane is located only 100 m south of the site and is a historic lane that has potential to be designated a Quiet Lane. • The proposed allocation off land at Elm Rise, Findon should be deleted and the land south of Barlavington Way, Midhurst (see photo below) should be allocated for development instead. (ICS Estates Ltd.) • The allocation is the sequentially preferable site in Findon required to accommodate the housing need, having the greatest capacity to accommodate landscape change whilst viably delivering the required quantum of affordable housing. The allocation boundary should be amended to enable inclusion of additional drainage and open space features, which would also allow more development on the least sensitive western part of the site. The policy should be re-worded to refer to a minimum of 20 dwellings, given there are 24 households in housing need and concerns over deliverability of other sites in Findon. (Seaward Properties Ltd.) <p>Individuals</p> <ul style="list-style-type: none"> • Local consultation has shown that other sites in the village are overwhelmingly preferred to the allocation site, for the reasons that it is a field adjoining other fields. Building on the site would be detrimental to the village and is wholly unnecessary given other sites being available. Reasons for objection include visibility from surrounding areas, current use as paddocks, and increased traffic congestion in village centre. (various individuals) | <p>I: There are local problems with surface water runoff. R: There are no identified flooding or surface water issues with this site. Policy SD49: Flood Risk Management requires development to seek to reduce the impact and extent of all types of flooding.</p> <p>I: The proposed allocation off land at Elm Rise, Findon should be deleted and the land south of Barlavington Way, Midhurst should be allocated for development instead. R: Midhurst is some 20 miles distant from Findon, therefore such an approach would do nothing to address local housing needs as required by the statutory duty.</p> <p>I: The allocation boundary should be amended to enable inclusion of additional drainage and open space features, which would also allow more development on the least sensitive western part of the site. The policy should be re-worded to refer to a minimum of 20 dwellings. R: It is considered that the boundary proposed in the Local Plan is appropriate; expansion of the allocation area is not supported as this would unnecessarily extend development beyond the site's (and also the settlement's) natural physical boundary. Noting the concerns expressed in representations regarding the site's capacity within its boundary, the Schedule of Changes (SDNP 01.1) includes a slight reduction in the number of homes, from 15-20 to 14-18.</p> <p>I: Object to the loss of paddocks arising from the allocation. R: The site is adjacent to a much larger area used as paddocks, and there are a number of further large paddocks around the village and in the wider area. The loss of paddocks is therefore insignificant.</p> <p>I: Concern over increase in traffic.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none">• Concern over flooding risk to existing properties and village arising from proposed development of the site. Water regularly runs down the hill, mud and sludge runoff regularly observed.• There is a large amount of local opposition to the proposed allocation and some uncertainty over deliverability. Alternative sites should be considered to ensure certainty that 30 dwellings can be delivered. (West of Nepcote landowner) | R: The amount of housing proposed for this site and Findon generally is modest, and the site would be accessed directly from an existing estate road. Increases in traffic movement are therefore not considered to be a significant constraint. |

Summary of Issues and Responses

Policy SD72: Soldiers Field House, Findon

There were a total of 7 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u></p> <p>Historic England: Welcomes and supports the descriptions of the historic environment of specific sites as part of the positive strategy for the conservation and enjoyment, and a clear strategy for enhancing, the historic environment. However, Historic England would prefer to see reference to Heritage Impact Assessment or Archaeological Assessment or both, with important archaeological remains or other historic features retained in situ wherever possible, or, where not possible, recorded for deposition within a public archive.</p> <p><u>Borough, City, County and District Councils</u></p> <p>No comments received.</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Object to allocation. The Parish Council has set up a working party to review the current made Neighbourhood Plan which will include alternative and more landscape sensitive site allocations to meet the required 30 dwellings for Findon. (Findon PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Findon UNP Working Group: <ul style="list-style-type: none"> There are available, deliverable alternative sites with capacity to absorb small scale housing development of around 30 dwellings, in conformity with Policy SD26, where affordable homes to meet local housing need would be more viable, and that would have lower landscape value | <p><i>I: Prefer to see reference to Heritage Impact Assessment or Archaeological Assessment or both.</i></p> <p>R: Policy SD12: Historic Environment requires submission of a Heritage Statement with all applications proposing development that may affect a heritage asset (whether designated or non-designated). Policy SD16: Archaeology requires this statement to contain sufficient information to assess the significance of any archaeological asset and the effect on the significance of that asset.</p> <p><i>I: There are available, deliverable alternative sites with capacity to absorb small scale housing development of around 30 dwellings, in conformity with Policy SD26, where affordable homes to meet local housing need would be more viable, and that would have lower landscape value and sensitivity. The site is one of two of the lowest ranked sites in a survey of local residents.</i></p> <p>R: The SDNPA is engaging with the emerging updated Findon Neighbourhood Plan, but disagrees with its conclusions with regard to the alternative sites proposed for allocation. The Sites and Settlements Route Map (SS 02) sets out the SDNPA's conclusions on alternative sites. In short, the two sites proposed for allocation in the South Downs Local Plan are considered to be the most suitable available and achievable sites to provide for the modest level of housing growth proposed for Findon.</p> <p><i>I: The building and site are of significant heritage value to Findon and its historic relationship with racehorse training.</i></p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>and sensitivity. These will be included in an updated Findon Neighbourhood Plan which is in the final stages of preparation.</p> <ul style="list-style-type: none"> ○ The site proposed for allocation is one of the lowest two ranked sites by a significant margin, from a survey of local residents which received 475 responses. ○ The building and site are of significant heritage value to Findon and its historic relationship with racehorse training. ○ Site is within setting of Nepcote Conservation Area which includes Nepcote Green which is the setting for the historic annual sheep fair. A development of 10-12 houses would be highly visible to visitors. ○ There is no financial viability evidence that redevelopment can better meet local housing needs. There is only enough viability in the site to provide 5 modest sized shared ownership 2/3 bedroom houses, and no dwellings to be provided for affordable rent. ○ Policy aspiration to achieve long term, sustainable indigenous screening and short term retention of the hedge is not deliverable. ○ The deliverability of SuDs where shallow soil is underlain by chalk is not robustly proven. ○ Access is privately owned and inadequate for 10-12 dwellings. Redevelopment of the site may need a new parallel access east of Soldiers Field Lane. Public vehicular access to the site access is via narrow sunken lanes not suited to an increase in traffic. ○ Site is furthest of all sites considered from a bus stop and the village centre, and is outside NPPF guideline distances from local facilities and public transport. ○ Density of development would be around 4 times that found in the locality. Development would fail to positively | <p>R: The building is not a listed building or otherwise recognised as a heritage asset, and is outside the conservation area. The building is widely acknowledged as being of low architectural merit. The historic connection of the building to a local racehorse trainer outlined in representations is not considered sufficient to outweigh the landscape and other benefits of redevelopment of the site.</p> <p><i>I: Site is within setting of Nepcote Conservation Area which includes Nepcote Green which is the setting for the historic annual sheep fair. A development of 10-12 houses would be highly visible to visitors.</i></p> <p>R: Site redevelopment is considered to provide opportunity for enhancements to the setting of the conservation area.</p> <p><i>I: There is no financial viability evidence that redevelopment can better meet local housing needs. There is only enough viability in the site to provide 5 modest sized shared ownership 2/3 bedroom houses, and no dwellings to be provided for affordable rent.</i></p> <p>R: The site is considered to have potential to deliver affordable homes in line with Policy SD28: Affordable Homes. Detailed considerations around viability, if this should be an issue, will be a matter for addressing at the development management stage.</p> <p><i>I: Policy aspiration to achieve long term, sustainable indigenous screening and short term retention of the hedge is not deliverable.</i></p> <p>R: It is considered that this policy requirement is deliverable and necessary to optimise wider landscape enhancements.</p> <p><i>I: The deliverability of SuDs where shallow soil is underlain by chalk is not robustly proven.</i></p> <p>R: Policy SD49: Flood Risk Management requires development to seek to reduce the impact and extent of all types of flooding. This will need to be considered further at the planning application stage.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p style="text-align: center;">enhance the downland landscape and setting of Wattle House, having regard to Purpose 1.</p> <ul style="list-style-type: none"> The proposed allocation off land at Soldiers Field House, Findon should be deleted and the land south of Barlavington Way, Midhurst (see photo below) should be allocated for development instead. (ICS Estates Ltd.) The allocation is the sequentially preferable site in Findon required to accommodate the housing need, having the greatest capacity to accommodate landscape change whilst viably delivering the required quantum of affordable housing. The allocation boundary should be amended to enable inclusion of additional drainage and open space features, which would also allow more development on the least sensitive western part of the site. The policy should be re-worded to refer to a minimum of 20 dwellings, given there are 24 households in housing need and concerns over deliverability of other sites in Findon. (Seaward Properties Ltd.) <p>Individuals</p> <ul style="list-style-type: none"> Support the principle of allocation. Policy should state ‘up to 12 dwellings’ rather than a range. Object to wording ‘planning permission will not be granted for any other uses’ which does not meet the positively prepared test. Object to statement ‘positively enhance the setting of the Wattle House’ which should instead be ‘preserve...’. Requirement to protect all trees on the site boundary should be made more flexible by adding ‘where possible’. The proposed development goes against the policy not to encroach on agricultural land, paddocks or green fields in an area of outstanding beauty. It would spoil views of Cissbury Ring and the other side of A24, and negatively impact on wildlife. There is a large amount of local opposition to the proposed allocation and some uncertainty over deliverability. Alternative | <p>I: Access is privately owned and inadequate for 10-12 dwellings. Redevelopment of the site may need a new parallel access east of Soldiers Field Lane. Public vehicular access to the site access is via narrow sunken lanes not suited to an increase in traffic. R: The existing access (Soldiers Field Lane) and public lane (Nepcote) are considered adequate for the modest scale of development proposed. Any improvement works required to ensure safe access will be considered at the planning application stage.</p> <p>I: Site is furthest of all sites considered from a bus stop and the village centre, and is outside NPPF guideline distances from local facilities and public transport. R: The site is approximately 6 minutes’ walk from the village centre and bus stop. This is considered highly accessible in the context of the National Park.</p> <p>I: Density of development would be around 4 times that found in the locality. Development would fail to positively enhance the downland landscape and setting of [listed building] Wattle House. R: Policy SD72 is designed to ensure an appropriate scale of development, which makes efficient and appropriate use of land, and has regard to the opportunities and constraints presented by the site. Appropriate redevelopment of the existing building and grounds, which are prominent in the landscape and detract from it, will enhance the landscape, and the setting of the listed building and the conservation area.</p> <p>I: The proposed allocation off land at Soldiers Field House, Findon should be deleted and the land south of Barlavington Way, Midhurst should be allocated for development instead.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>sites should be considered to ensure certainty that 30 dwellings can be delivered.</p> | <p>R: Midhurst is some 20 miles distant from Findon, therefore such an approach would do nothing to address local housing needs as required by the statutory duty.</p> <p><i>I: Policy should state 'up to 12 dwellings' rather than a range. Object to wording 'planning permission will not be granted for any other uses' which does not meet the positively prepared test. Object to statement 'positively enhance the setting of the Wattle House' which should instead be 'preserve...'. Requirement to protect all trees on the site boundary should be made more flexible by adding 'where possible'.</i></p> <p>R: The number (range) of homes proposed is considered to be appropriate; a range provides flexibility whilst also giving certainty over the 'floor' and 'ceiling' expected. The wording of the policy in other respects is considered to provide a positive framework whilst also providing certainty and clarity.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD73: Land at Petersfield Road, Greatham

There were a total of 24 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National Agencies</u></p> <p>Historic England support criterion 2b, and propose inserting a requirement for development to be informed by the Heritage Impact Assessment, Archaeological Assessment, or both, with important archaeological remains or other historic features retained in situ where possible or, where not possible, recorded for deposition within a public archive.</p> <p><u>Borough, City, County and District Councils</u></p> <p>No comments received</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • Number is too high: represents a 10% increase in number of dwellings in the village, unsustainable due to lack of local facilities. Should be 25 for the village, with 20 on the allocated site and 5 elsewhere. Village has recently lost mobile library. (Greatham PC) • No 4 or 5 bedroom dwellings should be provided. (Greatham PC) • Density is too high compared to the rest of the village. Reduce to 20 dwellings (Greatham PC) • Propose a solar farm on the rest of the site, after reducing dwelling number. (Greatham PC) • Entrance on brow of a hill; request traffic study before any application is agreed. (Greatham PC) • Support requirement for 50% affordable dwellings on site. (Greatham PC) • Would welcome provision of a public open space on site, with an associated cycle/pedestrian route. (Greatham PC) • Want full involvement in decision making about shop provision, bearing in mind past business failures; 'community type shop' would be beneficial. (Greatham PC) | <p><i>I: The development criteria should be changed to reduce the impact of the site</i></p> <p>R: Pages 35 and 36 of the Submitted Schedule of Changes proposes that the density of the development should decrease from East to West and makes additional references to the public right of way, a Green Infrastructure Strategy and requires a 'significant area of public open space' within the site. Further changes may arise following consultation on the Development Brief.</p> <p><i>I: The site should/should not be referred to as Previously Developed Land.</i></p> <p>R: Buildings and surrounding land that are currently in use for agricultural purposes are not included within the definition of PDL.</p> <p><i>I: Historic England would prefer to see reference to Heritage Impact Assessment or Archaeological Assessment or both.</i></p> <p>R: Policy SD12: Historic Environment requires submission of a Heritage Statement with all applications proposing development that may affect a heritage asset (whether designated or non-designated). Policy SD16: Archaeology requires this</p> |

Policy SD73: Land at Petersfield Road, Greatham

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> • Support retention and enhancement of existing trees and new, appropriate site boundaries. (Greatham PC) • Should be in keeping with local heritage assets and CA, should use local building materials. (Greatham PC) • Housing should incorporate sustainable energy capabilities e.g. solar panels. (Greatham PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • Site available for delivery within five years. (Cove Homes) • Allow a lower proportion of affordable homes, where 50% is not viable (Cove Homes) • A higher number of dwellings would be suitable on the site, given the dwelling mix requirements and size of the site; see recent pre application proposals. The number of dwellings proposed does not make the best use of PDL. (Cove Homes) • The policy should allow for a care home on site. Local Plan does not currently plan to meet the need for older peoples housing identified in the HEDNA. (Cove Homes) • The policy should not require a shop- no need for a shop in the village (see the marketing report accompanying the application to convert the former village shop to housing). The site is not large enough to justify a shop. Road frontage for a shop will be very hard to achieve so passing trade unlikely. Remove reference to a shop, or amend to state that it is dependent on finding an operator for whom it would be viable. (Cove Homes) • A case by case approach to mitigation of recreational impacts on the Wealden Heaths SPA is not workable. Need to amend Strategic Policy SD10 to include a strategic approach to mitigating recreational disturbance, and reference this in Allocation policy SD73. (RSPB) • Additional local sewerage infrastructure would be required to accommodate the proposed development. Need to insert condition requiring a connection to the nearest point of adequate capacity in the sewerage network to be provided, in collaboration with the service provider. (Southern Water) • There is sewerage infrastructure on the site, this needs an easement clear of all proposed buildings and substantial tree planting (Southern Water) • The site is in horticultural use therefore not PDL, so the concept 'making the best use of PDL' does not apply. SHLAA assessment as PDL is wrong. (Greatham Voice) | <p>statement to contain sufficient information to assess the significance of any archaeological asset and the effect on the significance of that asset.</p> |

Policy SD73: Land at Petersfield Road, Greatham

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> Propose only the portion occupied by a bungalow should be developed, with 30 dwellings, not the portions occupied by glasshouses, thereby avoiding change of use of land, and directing development towards the road, which is more in line with the current grain of development. The east and north areas of the site should be reserved as a buffer zone with the open countryside and Bakers Field. The site currently forms a gap between the denser parts of the village to the NE and the CA to the SW. Adjacent development at Bakers Field not in character with the village. The SA identified that more than 30 dwellings on site would contribute to the SDILCA 'Forces for Change'. Higher than average density would harm the setting of the village and the CA and the landscape and historical setting. Therefore not appropriate. (Greatham Voice) Settlement boundary should exclude areas of open space within the site. (Greatham Voice) Site is worse as a potential allocation than Barlavington Way, Midhurst, and should be discarded in favour of the latter. (ICS Estates Ltd) <p>Individuals</p> <p>Objections and concerns about the allocation (various individuals), due to:</p> <ul style="list-style-type: none"> Traffic increases; site entrance on brow of hill; area around the site is already very busy at peak times and subject to problem on street parking due to proximity to school and village hall; traffic risk to school children; the street is used as a rat run, with Ham Barn roundabout already not coping at peak times. Request for further consideration of traffic impacts (including EHDC councillor). Impact of traffic on tranquillity. Lack of capacity at village school and local GPs; cumulative impact on services with development at Whitehill/Bordon Settlement Facilities Assessment inaccurate, there is no longer a shop, PO, library or bus service suitable for commuting. The village is therefore unsuitable for an allocation, or for this size of allocation (various respondents) Loss of an employment generating land use More suitable sites available in the village including unnamed smaller sites, Longmoor Road MOD site. Damage to dark night skies: current use does not operate after 6pm; would introduce streetlights where few currently exist. | |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> • Harm to landscape; little existing screening around the site, would be prominent in views from the northern entrance to Greatham; adjacent road would lose its current rural character. • Impact on recreational experience of local footpaths and bridleways • Off site flooding; the site already contributes to surface and groundwater flooding on Bakersfield, this would worsen with development. • Wildlife on site including toads, rare species of lizards, deer, birds, butterflies and insects • Detrimental impact on Wealden Heaths SPA. • Reduce the dwelling number (to 25, 30 or 35 dwellings) and density/developed area of the site (numerous individuals, including EHDC councillor) The volume of development contradicts the number found suitable in the SHLAA; the density is inconsistent with the rest of the village and would remove the feeling of space in the village; impacts as listed above are amplified by a larger number of dwellings. <p>Design requests (various individuals), including:</p> <ul style="list-style-type: none"> • The development should not just reinforce, but enhance local distinctiveness • The layout should be linear to match most of the village; an estate led approach would follow the less positive design precedents in the area • A gap of 10m or 15- 20m should be retained between any new buildings and the site boundary (various individuals) • Buildings should be restricted in height to two storeys, or to the same height as neighbouring properties (various individuals) • Additional hedging along the boundary with Bakers Field, hedging to be well maintained (various individuals) • No driveways or parking areas within 5m or 15- 20m of the boundary (various individuals) • More clarity on height, size and layout, to safeguard heritage assets. • Dwellings must not be expensive or upmarket • Shop should be community run, open no later than 7pm, and have no neon signage (various individuals) <p>Alternative uses proposed including:</p> <ul style="list-style-type: none"> • Shop with post office and car parking for the school | |

Policy SD73: Land at Petersfield Road, Greatham

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none">• Solar farm• Wording changes requested to descriptions of the village and site. | |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD74: Land at Fern Farm, Longmoor Road, Greatham

There were a total of 11 responses to this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u> No comments received</p> <p><u>Borough, City, County and District Councils</u> Contribution sought for enhancing nearby rights of way (Hampshire County Council)</p> <p><u>Parish and Town Councils</u> No comments received.</p> <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • Acceptable subject to development complying with conditions and maintaining screening from Wolfmere Lane (Individual, Cllr Budden) • Greatham Voice and various individuals made the following key points: <ul style="list-style-type: none"> ○ Object due to the impact on the landscape. Encroachment into the landscape. Significant change to settlement boundary. ○ Positioned between two areas of nature designation and within the 5km Wealden Heaths Phase 2 buffer. ○ The evidence to support the allocation is out of date and in contradiction with itself. Additional 2 pitches when no identified need. Supporting | <p><i>I: Object due to impact on the landscape.</i> R: The site is well contained within the landscape and the policy requires provision of an attractive street frontage to Longmoor Road.</p> <p><i>I: The site is within 5 km of the Wealden Heaths Phase 2 SPA.</i> R: The Wealden Heaths SPA Phase 2 SPD has recently been adopted by both the SDNPA and East Hampshire District Council. This seeks to prevent conventional market housing within the SPA buffer, but allows for a limited amount of Gypsy and Traveller &/or affordable housing to be delivered. This is an appropriate and pragmatic response to the constraint of the SPA which recognises the difficulty in identifying suitable Gypsy and Traveller sites.</p> <p><i>I: The evidence to support the allocation is out of date and in contradiction with itself. Additional 2 pitches when no identified need.</i> R: There is a need for 6 gypsy and traveller pitches to be provided in the East Hampshire part of the South Downs National Park, and further needs arising from outside the National Park. See East Hampshire GTAA (TSF 17).</p> <p><i>I: Gypsy and Traveller site proposed within the open countryside, which is contrary to National Planning Policy and SDNPA policies.</i> R: The site is well-related to the existing settlement. The policy requires that development should not extend beyond the rear building line of Wolfmere Lane.</p> <p><i>I: Concern over potential impacts on the Shipwrights public right of way.</i> R: It is considered there will be minimal impact on the nearby public right of way.</p> |

Policy SD74: Land at Fern Farm, Longmoor Road, Greatham

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>study suggests further pitches would be unacceptable in the location. No reason or justification for this further allocation.</p> <ul style="list-style-type: none"> ○ Issues which have been assessed by accompanying Sustainability Appraisal conclude as having 'uncertain effects'. ○ Concern that Gypsy and Traveller site proposed within the open countryside, which is contrary to National Planning Policy and SDNPA policies. ○ Potential impacts on the Shipwrights public right of way. <ul style="list-style-type: none"> • Policy should include a requirement for enhancements to biodiversity. (Sussex / Hampshire Wildlife Trust) <p>Individuals</p> <ul style="list-style-type: none"> • Allocation of 4 pitches not in proportion to rest of SDNP. • Up to 9 homes could be accommodated along Longmoor Road instead. • Restricts the ability of travellers to settle in other parts of the National Park. • Street frontage development and larger access will harm rural feel. • Increase in traffic from this and surrounding developments is a concern. Traffic calming is needed. | <p>I: Policy should include a requirement for enhancements to biodiversity. R: Policy SD9 and supporting text (in particular paragraph 5.72) sets out requirements for all development to conserve and enhance biodiversity, and to provide appropriate information and evidence on potential impacts to wildlife sites.</p> <p>I: Allocation of 4 pitches not in proportion to rest of SDNP R: The Local Plan proposes to allocate 13 Gypsy or Traveller pitches across the National Park, of which 8 are to be located in the East Hants district. 5 of these already exist, therefore 3 new pitches are proposed including two additional at Fern Farm, Greatham. The change to the existing situation is therefore considered to be minimal, and to represent the most pragmatic and deliverable approach.</p> <p>I: Up to 9 homes could be accommodated along Longmoor Road instead. R: The Wealden Heaths SPA Phase 2 SPD has recently been adopted by both the SDNPA and East Hampshire District Council. This seeks to prevent conventional market housing within the SPA buffer, but allows for a limited amount of Gypsy and Traveller &/or affordable housing to be delivered. Therefore open market-led housing is not supported by evidence on the need to protect the Wealden Heaths SPA Phase 2.</p> <p>I: Concerns over impact on character of the area including street frontage, access improvements and traffic. R: The policy requires the creation of an attractive frontage to Longmoor Road. There is already a well formed access that is unlikely to require further improvements. There is very unlikely to be any significant increase in traffic movements arising from two additional pitches on this site.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD75: Half Acre, Hawkley Road, Hawkley

There were a total of 4 responses to this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u> No comments received</p> <p><u>Borough, City, County and District Councils</u> Support parts of policy seeking protection of the BOAT 25 (adjoining footpath) (Hampshire County Council)</p> <p><u>Parish and Town Councils</u> Hawkley PC made the following comments:</p> <ul style="list-style-type: none"> • Remove allocation from Local Plan. • Large amount of local opposition, site included without the normal public scrutiny, consultation and dialogue with Parish Council. • Allocation relates more to the lack of alternatives than the application of planning policy. • The beauty of the SDNP landscape should not be sacrificed. Previous decisions refusing development on the site refer to it being intrusive in the local environment. Site is surrounded by significant viewpoints, • Understand issues have been raised by other commentators about the completeness of information made available to the consultants undertaking the site study. • Noise, rubbish, disturbance from animals impact on use of adjoining footpath. • Previous temporary permission tied to the special circumstances of the then occupants. • The sustainability assessment states that the site is accessible with sustainable transport links. The site is a significant walk to, and from, the nearest (limited) shops, bus route or railway station. There are no footpaths to Liss and its services • Hedging surrounding the site can be removed. | <p>**Note: Full planning permission has been granted on this site for 3 permanent Gypsy and Traveller pitches. Decision issued 18 June 2018. **</p> |

Policy SD75: Half Acre, Hawkley Road, Hawkley

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

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| <p><u>Individuals</u></p> <ul style="list-style-type: none">• Opposition to giving permanence to Half Acre. Was an understanding that it would only be temporary, no indication that this should change. (Cllr Budden)• Noise, rubbish, disturbance from animals impact on use of adjoining footpath. (Cllr Budden)• Current assessment did not include all possible potential sites. (Cllr Budden) | |
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South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD76: Land at Itchen Abbas House, Itchen Abbas

There were a total of 9 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National Agencies</u> No comments received</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Hampshire CC support criterion 1e) and request that development provide pedestrian links to adjacent Footpath 34, and resurface the latter to Countryside Service Design Standards to support green travel and mitigate for increase wear and tear. (HCC) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> The proposed allocation is unlikely to be delivered within 0-5 years and will not fully meet the identified need for affordable housing in the parish (17 applications on the waiting list). Adjacent sites (SHLAA refs WI063 and WI064) should also be allocated, the PC disagrees with the negative SHLAA landscape assessment on these sites. However, the Plan is considered to be sound and compliant. (Itchen Valley PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Propose deletion of the site due to unclear landscape impacts and the low rating of the village in the SFA, and its replacement with allocation of land south of Barlavington Way, Midhurst. (ICS Estates) Evidence base supporting the allocations is insufficient. Ecosystem services approach does not seem to have fed into site selection, | <p><i>I: Request that development provide pedestrian links to adjacent Footpath 34, and resurface the latter to Countryside Service Design Standards to support green travel and mitigate for increase wear and tear</i> R: Criterion I(e) is amended, as set out on page 36 of the submitted Schedule of Changes, to require enhancement of the amenity, character and functionality of the adjacent Public Right of Way.</p> <p><i>I: Allocation will not fully meet the identified need for affordable housing in the parish (17 applications on the waiting list). Adjacent sites (SHLAA refs WI063 and WI064) should also be allocated, the PC disagrees with the negative SHLAA landscape assessment on these sites.</i> R: It is considered that the proposed allocation of this site will make a contribution to the affordable housing needs of Itchen Abbas. The conclusions of the SHLAA landscape assessments (Core Document TSF10), based on information and circumstances of these sites as currently understood, are considered robust and correct.</p> <p><i>I: Approach to biodiversity is insufficient. Ecosystem services approach does not seem to have fed into site selection, but was retrofitted afterwards. Site allocations should be reassessed, including with on-the-ground ecological to ensure existing biodiversity value is properly considered and include a requirement for up-to-date</i></p> |

Policy SD76: Land at Itchen Abbas House, Itchen Abbas

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>but was retrofitted afterwards. Site allocations should be reassessed, including with on-the-ground ecological to ensure existing biodiversity value is properly considered. Inconsistent approach to biodiversity between the different allocations. All allocation policies (not supporting text) should include a requirement for up-to-date ecological information and conservation <i>and</i> enhancement of biodiversity. Allocations containing ecosystem services symbols should contain a caveat in the policy to ensure that enhancements to natural capital are not limited to those requirements listed specifically in the policy. (Wildlife Trusts)</p> <ul style="list-style-type: none"> Object to the allocation due to the value of the garden as setting for one of the village's older and more interesting houses; lack of pavement to the site; precedent for further development of nearby open areas; lack of mains drainage and proximity to River Itchen; quantum of recent development in the village, combined with limited local services. (Upper Itchen Valley Society). <p>Individuals</p> <ul style="list-style-type: none"> Development should include provision of a footway connecting development to the main footway along the B3047, and/or to the disused railway footpath to the N. (HCC Cllr) Would support extension of settlement boundary on the west side of Itchen Abbas (HCC Cllr) Owners of part of the site do not agree to the proposed development. Owners of the current access to the site have not agreed to the proposed development; instead they propose their own land (adjacent, to the north) for development with the same number of dwellings. Object to the proposed allocation due previous dismissal of appeal on the site; due to extension of the settlement into the | <p><i>ecological information and conservation and enhancement of biodiversity</i></p> <p>R: The ecosystems services approach for allocations is set out on pages 219 and 220 of the Local Plan. In summary GIS software tool was used to identify how site allocations may affect ecosystem services and this informed bespoke development requirements in site allocations where multiple ecosystems services are identified by the GIS tool. Policy SD9 and supporting text (in particular paragraph 5.72) sets out requirements for all development to conserve and enhance biodiversity, and to provide appropriate information and evidence on potential impacts to wildlife sites</p> <p><i>I: Object to the allocation due to the value of the garden as setting for one of the village's older and more interesting houses.</i></p> <p>R: The list of evidence studies in paragraph 9.126 includes a Heritage Statement. The Local Plan policy SD5 requires a landscape-led approach to design and this includes the historic character of settlements.</p> <p><i>I: Owners of the current access to the site have not agreed to the proposed development</i></p> <p>R: Criterion I(d) requires the provision of a suitable new vehicular access if the current vehicular access is not suitable or available.</p> <p><i>I: Lack of mains drainage and proximity to River Itchen</i></p> <p>R: Criterion I(a) requires it to be demonstrated that there will be no likely significant effect on the environmental designations of the River Itchen. The list of evidence studies includes a project-level Habitats Regulations Assessment.</p> <p><i>I: Owners of part of the site do not agree to the proposed development</i></p> |

Policy SD76: Land at Itchen Abbas House, Itchen Abbas

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>countryside; also due to proximity to the river Itchen, in combination with lack of mains drainage, with potential risk of sewer overflow into the river.</p> <ul style="list-style-type: none"> Propose that the SDLP should set a number for the village as a whole, without identifying sites, and that number of dwellings to come forward through the planning application process. | <p>R: The Policies Map has been amended to show the area now understood to be available for development, as set out in Appendix 3 of the submitted Schedule of Changes.</p> <p><i>I: Propose that the SDLP should set a number for the village as a whole, without identifying sites, and that number of dwellings to come forward through the planning application process.</i></p> <p>R: The NPPF requires that local plans provide a positive framework for development to come forward. It is appropriate to as far as possible provide certainty to communities and developers, by identifying appropriate sites and locations for development. The South Downs Local Plan allocates sites for settlements that will benefit from some housing growth, and do not have a sufficiently advanced neighbourhood plan.</p> |

Summary of Issues and Responses

Policy SD77: Castelmer Fruit Farm, Kingston near Lewes

There were a total of 15 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National Agencies and utility providers</u> Historic England: support the requirement for an archaeological survey, but request additional wording to explain that important archaeological remains or other historic features are retained in situ where possible or, where not possible, recorded for deposition within a public archive.</p> <p><u>Borough, City, County and District Councils</u> No comments received.</p> <p><u>Parish and Town Councils</u> Kingston Parish Council consider the allocation unsound for the following reasons:</p> <ul style="list-style-type: none"> • The consultation with parishes has been limited and flawed and there is no clarity with regards to site selection; • Lack of necessary infrastructure to support the proposal; • The site was not included as part of the Site Allocations Highway Assessment and there are road safety and traffic issues including insufficient visibility regarding the junction with Ashcombe Lane; • The proposal may require changes to the road layout, removal of trees and possibly street lighting which would change the character of the village; | <p><i>I: Any archaeological remains or other historic features found on site should be retained in situ where possible or, where not possible, recorded for deposition within a public archive</i> R: Paragraph 9.138 of the supporting text lists the following evidence studies that will need to inform any planning application for this site, one of which is for an archaeological survey. This is because the Historic Environment Record (HER) has identified some evidence for archaeological remains to be found near the boundaries of the site. If any further archaeological remains are discovered as part of this survey work, the requirements of Local Plan Policy SD16: Archaeology will apply which covers how to treat archaeological discoveries.</p> <p><i>I: The consultation with parishes has been limited and flawed and there is no clarity with regards to site selection, lack of community engagement and consultation</i> R: The Sites and Settlements: Route Map for Housing Allocations Background Paper April 2018 (SS 02) sets out how potential housing allocation sites were considered during the preparation of the emerging South Downs Local Plan (SDLP) and what community engagement and consultation has taken place. It explains the process we have undertaken in assessing sites for housing and progressing the most suitable through to their allocation as set out in the South Downs Local Plan Pre-Submission (Regulation 19) September 2017.</p> <p><i>I: There should be no possibility of a road link or extending the development in the future to Spring Barn Farm</i></p> |

Policy SD77: Castelmer Fruit Farm, Kingston near Lewes

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> There should be no possibility of a road link or extending the development in the future to Spring Barn Farm; While there is general support for limited development of appropriate housing, this needs to be realistically priced and generally aimed at buyers on mid and lower range incomes; There should be further scrutiny and analysis on deliverability regarding the issues identified; Proposals should also include consideration of the need to manage traffic flows on the C7 road, including encouraging use of the A26 as the main link between Newhaven and Lewes, providing proper visitor car parking facilities and urgent improvements to the existing footpath connecting Cranedown and Spring Barn Farm, including upgrade to a cycle track. <p>Other organisations DMH Stallard acting on behalf of the landowner supports the proposed allocation but has concerns over certain elements and requirements: including the requirement for site specific flood risk assessment; for the woodland to the north to be made publically accessible; to provide off-site links to existing Public Rights of Way; for an archaeological survey to be carried out and requests that the affordable housing requirement is only a target.</p> <p>Individuals</p> <ul style="list-style-type: none"> Object to the proposal as the village has poor amenities and lacks infrastructure; There are road safety, traffic issues and restrictions with visibility regarding the junction with Ashcombe Lane; Traffic calming is needed to reduce the speed of traffic; | <p>R: This issue is addressed by criterion h) of this policy which stipulates that the site layout should not include opportunities to provide future vehicular access into either adjacent fields or the remainder of the Castelmer Fruit Farm site. This has now been qualified, in response to representations by the landowners' agent, so that a small track for management of the remaining land should be allowed. The submitted Schedule of Changes contains a proposed change to the wording of this criterion to say '<i>other than a narrow single track for the purpose of maintain land</i>' (please see page 37 of the submitted Schedule of Changes Policy ref: Policy SD77 (I) criterion h).</p> <p><i>I: Do not agree with the requirement for a flood risk assessment and an archaeological survey to be carried out; for the woodland to the north to be made publically accessible; to provide off-site links to existing Public Rights of Way and the affordable housing requirement should only be a target.</i></p> <p>R: The SDNPA's Level 1 update and Level 2 SFRA (TSF 45) has identified that a small part of the allocation site is at risk from surface water flooding and that there is the potential for groundwater emergence from the chalk aquifer. In addition, as explained above the HER has revealed the potential for some archaeological remains to be found at or near this site. It is therefore considered appropriate to request that a site specific flood risk assessment and an archaeological survey should form part of the evidence base for any development proposals. The supporting text to this policy incorrectly stated that the woodland to the north was within the site allocation boundary. This is to be rectified in the submitted Schedule of Changes as set out on page 37 Para and Policy Ref: 9.128, 9.135, 9.136 and Policy SD77(I) criterion a). Further discussion with the landowners, their agent and the developer of this site has now led to support to delivering additional ecosystem services and other public benefits as part of the development proposals for this site, in line with National Park purposes and duty. It is anticipated that a Statement of Common Ground will be agreed between the SDNPA and the developer to identify where opportunities for improved footpath links could be achieved and how the woodland to the north, which is a Priority Habitat, could be better managed for biodiversity and public access.</p> |

Policy SD77: Castelmer Fruit Farm, Kingston near Lewes

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> • The electricity sub-station restricts the width of the entrance and the lane is unsuitable for refuse vehicles without widening which will impact on neighbouring properties; • Access to the site may require the need for a mini roundabout with lighting which would harm the character of the village; • The allocation will result in the loss of a number of mature trees; • The inclusion of the site within the settlement boundary is at odds with the 2015 settlement boundary review; • Lack of appropriate community engagement and feedback; • Lack of proper evidence base; • No proper site selection process undertaken and little explanation why alternative sites are not suitable; • Land at Wellgreen Lane was the only site in Kingston that was assessed positively in the SHLAA; and there are greater number of uncertain effects are identified in the Sustainability Appraisal affecting the Castlmer site than the Wellgreen Lane site; • Development on this scale is not in keeping with the character of the village; • The development should be restricted to the area of the site currently occupied by existing buildings and should not include the land to the east; • It is not clear how the publically accessible land will be maintained and funded; • The allocation will have a significant detrimental impact upon the landscape and be visually dominant in views to the north and north east; • Do not believe truly affordable housing will be delivered; | <p>In terms of the requirement for affordable housing; affordability of housing is major barrier to sustainable communities in the National Park. The SDNPA 's Housing and Economic Development Needs Assessment (HEDNA) (TSF 08) which supports the Local Plan Affordable Housing policy SD28 concluded that there is strong justification for policies that seek to maximise delivery of affordable housing. The SDNPA's Viability Assessment: CIL and Affordable Housing (TSF 13) demonstrates that the affordable housing requirement set out in SD28 is viable.</p> <p><i>I: There are road safety, traffic issues and restrictions with visibility regarding the junction with Ashcombe Lane; traffic calming is needed to reduce the speed of traffic; the electricity sub-station restricts the width of the entrance and the lane is unsuitable for refuse vehicles without widening which will impact on neighbouring properties</i></p> <p>R: Hampshire County Council's (HCC) Engineering Consultancy was commissioned by the SDNPA to provide highways advice for a number of site allocations including this one, which is set out in the Site Allocations Highways Assessment Report Update March 2018 (SS 08a). This concludes that there is sufficient width for access improvements to accommodate new development and in principle suitable access can be achieved from this site. The agent for the landowner of an omission site in Kingston has produced alternative evidence that seeks to demonstrate that access is unachievable. In light of this, the proposed developer of SD 77 has commissioned further more detailed highway evidence to demonstrate that suitable access can be achieved.</p> <p><i>I: Proposals should also include consideration of the need to manage traffic flows on the C7 road, including encouraging use of the A26 as the main link between Newhaven and Lewes, providing proper visitor car parking facilities and urgent improvements to the existing footpath connecting Cranedown and Spring Barn Farm, including upgrade to a cycle track</i></p> <p>R: The allocation for this site is only to provide 10 to 12 residential units and it is therefore unlikely to be feasible to require the developer of this site to provide major traffic improvements to the main highway and new village car parking. As set</p> |

Policy SD77: Castlmer Fruit Farm, Kingston near Lewes

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> No evidence that additional housing is needed in Kingston. The proposal represents an expansion of backland development. Cllr V lent (Lewes District Council) | <p>out in the policy and supporting text opportunities will be sought to provide improvements to public rights of way.</p> <p><i>I: Land at Wellgreen Lane was the only site in Kingston that was assessed positively in the SHLAA; and there are greater number of uncertain effects are identified in the Sustainability Appraisal affecting the Castelmer site than the Wellgreen Lane site</i></p> <p>R: Land at Castelmer Fruit Farm was put forward as a potential site allocation after the SHLAA had been published. It was taken forward as the preferred site allocation for the village of Kingston as: it is considered to be well-related to the village; it comprises partly previously developed land which contains a commercial garage and dilapidated greenhouses where redevelopment for housing could potentially remediate any localised land contamination associated with the current use (MOT garage) and improve the overall appearance of the site. As such, the site was considered to be suitable for a modestly sized housing allocation site which utilised the previously developed land and some of the orchard land. The development of the site also had the potential to deliver ecosystem services and biodiversity and public access improvements. The Sustainability Appraisal concludes that there are no significant effects arising from the allocation of this site.</p> <p><i>I: The allocation will have a significant detrimental impact upon the character of the village and landscape and will be visually dominant in views to the north and north east; development should be restricted to the area of the site currently occupied by existing buildings and should not include the land to the east</i></p> <p>R: In terms of landscape quality, the site has been evaluated as having medium sensitivity due to some visual impact in the wider landscape. The site also includes previously developed land where existing properties/greenhouses stand. This is recognised by the policy, which seeks to ensure that new development is accompanied by a Landscape Visual Impact Assessment and a suitably landscaped transition at the site boundaries is implemented.</p> |

Summary of Issues and Responses

Policy SD78: The Pump House, Kingston

There were a total of 10 responses to this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p>Specific consultation bodies – national agencies and utility providers other local authorities</p> <ul style="list-style-type: none"> No comments received <p>Parish and Town Councils</p> <ul style="list-style-type: none"> Kingston Parish Council made the following comments: Lack of consultation, not in compliance with National Policy Planning Framework. A need for a permanent site for longer term use by the wider gypsy/traveller community has not been proven. Concern that the allocation is larger than necessary for one permanent pitch. This leaves the possibility of the number of pitches being increased in the future. It is not clear from the draft Plan whether the landowner is supportive of the proposal. The plan should include consideration of the following infrastructure requirements: Increasing levels of traffic on the C324 which passes through Kingston and links to the A27 Lack of a proper car park for visitors to the village, the local school and the National Park which is a concern The provision of well-maintained footpaths. If a permanent site is to be designated, a much smaller area of land should be allocated | <p>I: A need for a permanent site for longer term use by the wider gypsy/traveller community has not been proven. R: There is an assessed unmet need for 6 Gypsy & Traveller pitches in the South Downs National Park falling within Lewes, Eastbourne and Wealden areas. See the East Sussex Districts GTAA (TSF 24) for details.</p> <p>I: Concern that the allocation is larger than necessary for one permanent pitch. This leaves the possibility of the number of pitches being increased in the future. R: The site boundary includes the curtilage of and access to the site. The policy is clear that only 1 pitch will be permitted on the site.</p> <p>I: It is not clear from the draft Plan whether the landowner is supportive of the proposal. R: The pitch and structures already exist. There is no evidence to support the suggestion that the pitch will not be needed and occupied in future.</p> <p>I: There should be consideration of infrastructure requirements. R: The allocation is for a single family pitch which already exists. This has de minimis impact on local infrastructure.</p> <p>I: It is not clear where the caravan should be sited. R: The caravan is already in situ.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>Other organisations and individuals</p> <ul style="list-style-type: none"> • Strongly support allocation of this site, which is occupied by Gypsy Travellers with long connections to the area, who are in need of further pitches for their extended family. (Heine Planning) • Object to allocation, suggest it should be removed. (Various individuals) • Not included in earlier consultations, not a clear or transparent process. (Various individuals) • Not clear where the caravan should be sited. (Individual) • Site access is unnecessarily large. (Various individuals) • Not to date received the consent of the land owner to the proposal for a permanent pitch. (Various individuals) • There are open views to the site from The Ridge and surrounding hills. It is unclear why it is necessary for so much land to be allocated opposite Downsmead and in front of the Pump House. (Various individuals) • The word 'Gypsy' or 'Traveller' is not mentioned on any part the planning application relating to the site. The site should not be named as a Gypsy & Traveller site. (Various individuals) • There were specific family circumstances as to why the current planning consent was temporary, and there is no reason why this should change – no demonstrable need for a permanent site. (Individual) • All should have same rights, but Gypsies and Travellers are granted special privileges. (Individual) • Gypsy and Traveller pitch is inconsistent with surrounding bricks and mortars homes. (Individual) • Caravan access is restricted into Pump House. (Individual) • Proper permanent sites need to be provided in the SDNP to give residents a choice. (Individual) | <p>I: There are open views to the site from The Ridge and surrounding hills / Gypsy and Traveller pitch is inconsistent with surrounding bricks and mortars homes. R: The caravan as exists is already part of the established landscape, and is viewed in the context of existing houses and outbuildings at Kingston Ridge.</p> <p>I: Why is the site being considered when it was omitted from 2012 assessment. R: The original site assessment was undertaken in 2011 to inform the Lewes Core Strategy, as outlined in the Gypsy and Traveller Background Paper (TSF 14).</p> <p>I: Include need for ecological assessment within policy (Sussex Wildlife Trust / Hampshire & Isle of Wight Wildlife Trust). R: The allocation is to regularise an existing pitch. Further ecological work is therefore unnecessary as there will be no material change.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none">• Why is the site being considered when it was omitted from 2012 assessment. (Individual)• Include need for ecological assessment within policy (Sussex Wildlife Trust / Hampshire & Isle of Wight Wildlife Trust).• Support allocation. Gypsy & Traveller family with long connections to local area. (Individual) | |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD79: Land at Old Malling Farm, Lewes

There were a total of 13 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u></p> <p>Environment Agency: Consider policy is not as effective as it could be at managing flood risk, and request amendments to criterion 5(f) to explicitly state residential development should be located in Flood Zone 1 only. Pleased to see inclusion of criteria 5(g) and 5(h), although note nothing related to flood compensation storage, or restricting development in Flood Zone 3b to only Essential Infrastructure or Water Compatible development, and suggest additional text is added to part 5 of the policy to resolve. Comments reflect the Level 1 Update and Level 2 SFRA Final Report.</p> <p>Historic England: Welcome and supports the policy as part of the positive strategy for the conservation and enjoyment, and a clear strategy for enhancing the historic environment. However, Historic England would prefer to see reference to Heritage Impact Assessment or Archaeological Assessment or both, with important archaeological remains or other historic features retained in situ wherever possible, or, where not possible, recorded for deposition within a public archive.</p> <p>Southern Water: Assessment reveals that additional local water and sewerage infrastructure would be required to accommodate the proposed development (involving making a connection to the water and sewerage networks at the nearest points of adequate capacity). Request that the need for additional infrastructure at specific sites is recognised within the policy.</p> | <p><i>I: Policy not as effective as it could be at managing flood risk</i> R: Criterion 1f of the policy (SD79) has been amended (p38 of the submitted Schedule of Changes) to include measures as set out in the Level 1 Update and Level 2 SFRA final report 2017. This is now supported by the Environment Agency as set out in the Position Statement with the Environment Agency dated February 2018 (SoCG 15).</p> <p><i>I: Should be reference to heritage statement in the policy</i> R: It is appropriate to refer to the heritage statement in the supporting text as with all evidence studies. This is consistent with the format used across all allocation policies.</p> <p><i>I: Need for additional infrastructure at this site to be recognised within the policy</i> R: This is a matter appropriately dealt with at the development management stage.</p> <p><i>I: Policy does not make clear whether the demand for school places arising from the development has been properly planned for.</i> R: The issue of educational needs for Lewes is addressed in the Statement of Common Ground with East Sussex County Council (SoCG 13). In addition, as set out in the introduction of the Local Plan, there is no need to duplicate the requirements of other policies (such as SD42:</p> |

Policy SD79: Land at Old Malling Farm, Lewes

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>Education and Skills Funding Agency: consider the policy (and Local Plan as a whole) does not make clear whether the demand for school places arising from the development has been properly planned for, which would need to be rectified, in order to demonstrate the Local Plan has been positively prepared.</p> <p><u>Borough, City, County and District Councils</u> No comments received</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Design Brief should be landscape and ecosystem services led, and include a Green Infrastructure Strategy and site Masterplan, informed by suitable evidence. (Lewes Town Council) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Support principle of allocation, but object to the reduction in housing numbers from 'approximately 240 dwellings' to 'between 220-240 dwellings' and to the inclusion of criteria 5(c) and 5(k). The former is objected to, as it is outside of the site boundary and not within the owner's control, whilst the latter is considered to be wholly unjustified and was previously rejected during the examination of the Lewes and SDNPA Joint Core Strategy. It is also considered that the supporting text should reference explicitly the Inspector's comments on the site, in respect of the landscape impact and housing need. (Luken Beck, on behalf of the landowners of Old Mallings Farm) Allocation is inconsistent with landscape-led principle emphasised by Local Plan (Friends of Lewes and South Downs Society) Highly visible from several viewpoints and serves as a valuable tongue of Green Infrastructure, linking Lewes with the open countryside of the Ouse Valley, which contributed to the decision to include the | <p>Infrastructure) within the specific site allocation policies as the plan should be read as a whole.</p> <p><i>I: Object to reduction in housing number from 'approximately 240 dwellings' to 'between 220-240 dwellings'</i> R: A range of between 220 to 240 dwellings is considered appropriate as it provides some flexibility in terms of development design and layout, particularly in light of the landscape sensitivities associated with the site. The South Downs Local Plan Preferred Options (LP 03, p.200, Policy SD-SS03) contained a draft site allocation policy for approximately 200 dwellings, subject to the outcome of the Lewes Joint Core Strategy examination. The South Downs Local Plan Policy SD79 will, when adopted, replace Lewes JCS Spatial Policy SP4 (Ex 03) which allocated the site for approximately 240 dwellings. Policy SD79 allocates for 220-240 dwellings, thereby increasing the capacity compared with the Preferred Options, and in effect allowing for up to 240 dwellings to come forward. Therefore there is no inconsistency.</p> <p><i>I: Object to inclusion of criterion 5(c) 'Suitably designed access for pedestrians and cyclists should be provided from the site to the disused railway line adjacent to the site'</i> R: The disused railway line is immediately adjacent to the application site and provision of the suitably designed access for pedestrians and cyclists is considered to be necessary to make the development acceptable and would be fairly and reasonably related in scale and kind to the development. It is therefore considered acceptable to include this criterion.</p> <p><i>I: Object to inclusion of criterion 5(k) 'Residential development is restricted to the parts of the site above the 10 metre contour in the northern field and further than 20 metres from the western and southern boundary in the southern field. Through appropriate</i></p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>town within the National Park boundary. (Friends of Lewes and South Downs Society)</p> <ul style="list-style-type: none"> • Object to policy unless convincing landscape reasons can be given to say otherwise. Acknowledge inclusion of site within the SDNPA and Lewes Joint Core Strategy, but that Plan and the Inspector's reasoning for including the allocation was housing led. (Friends of Lewes) • Object to policy unless it can be demonstrated there are insufficient brownfield sites to meet Lewes Town housing needs. (South Downs Society) <p>Individuals</p> <ul style="list-style-type: none"> • Concern regarding the impact of potential public access to areas of the floodplain • No reassurance regarding the preservation of privacy of residents at Old Mallig Farm, which will be dramatically impacted by the allocation, or the conservation of the historical site. • Object to the principle of the allocation, as the original allocation within the JCS was housing need led, whereas the South Downs Local Plan is landscape led. There are sufficient brownfield sites to address the housing need. (various individuals and Cllr Vic lent, Lewes DC) • Concern regarding the impact on heritage assets (in particular archaeology) • Object as site currently provided important green finger and would result of loss of agricultural land. Preference for continuing farming of the land. (various individuals and Cllr Vic lent, Lewes DC) • Would like site to focus on affordable rent, rather than shared ownership (Cllr Joanna Carter, Lewes DC) • Presumption in favour of planting native trees, hedgerow and wildflowers (Cllr Joanna Carter, Lewes DC) • More emphasis needed on sustainability and climate resilience within design (Cllr Joanna Carter, Lewes DC) | <p><i>landscaping these areas should provide a suitable transition from to the adjacent Ouse Valley'</i></p> <p>R: Criterion 5(k) has been omitted (p38 of the submitted Schedule of Changes), to maintain consistency with the Lewes Joint Core Strategy (JCS) (Ex 03). No new evidence has been produced to suggest the proposed criterion (which had been rejected during the examination of the Lewes JCS) should be introduced.</p> <p><i>I: Objection to principle of allocation (not taken a landscape led approach, brownfield sites to be allocated first, loss of agricultural land)</i></p> <p>The principle of the site allocation was established as part of the Lewes JCS (Ex 03). It is appropriate that this site is allocated through the Local Plan as it is available and deliverable. Measures are in place to secure a development that follows a landscape led approach, through specific criteria within the allocation policy, the requirement to produce a Design Brief for the development and, other policies within the Local Plan.</p> <p><i>I: Concern regarding public access to flood plain</i></p> <p>R: This is a matter appropriately dealt with at the development management stage.</p> <p><i>I: Concern regarding impact on existing residents at Old Mallig Farm</i></p> <p>R: This is a matter appropriately dealt with at the development management stage.</p> <p><i>I: Concern regarding impact on heritage assets</i></p> <p>R: This is a matter appropriately dealt with at the development management stage.</p> |

Policy SD79: Land at Old Mallig Farm, Lewes

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> Appropriate investment in infrastructure required, including sustainable transport links connecting to Lewes and beyond, creation of community and employment space (on or off-site) and facilities for teenagers/young people. The provision of a cycle route along the railway cut would be welcomed (Cllr Joanna Carter, Lewes DC) | <p><i>I: Site should focus on affordable-rented provision, rather than shared ownership</i> R: Housing tenure is dealt with under policy SD28 of the South Downs Local Plan Pre-submission. There is no evidence to suggest that a bespoke approach to affordable housing provision should be provided as part of this specific allocation policy.</p> <p><i>I: Presumption in favour of native planting</i> R: This is a matter appropriately dealt with at the development management stage.</p> <p><i>I: Further emphasis needed on sustainability and climate resilience</i> R: This is a matter which is dealt with in detail in other policies within the South Downs Local Plan Pre-submission, including SD2 (Ecosystem Services), SD3 (Major Development), SD5 (Design) and SD48 (Climate Change and Sustainable Use of Resources).</p> <p><i>I: Appropriate investment in infrastructure</i> R: There is no need to duplicate the requirements of other policies (such as SD42: Infrastructure) within the specific site allocation policies as the plan should be read as a whole. Please see above comment regarding the disused railway line.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD80: Malling Brooks, Lewes

There were a total of 4 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u></p> <p>Environment Agency: Criterion I(e): Should include greater flexibility, rather than referring to the FRA for the current planning permission. That may not be suitable for a new scheme. Amend as follows: ‘A comprehensive approach to flood risk management will be adopted and development will be undertaken in accordance with the recommendations of an agreed Flood Risk Assessment’.</p> <p>Historic England: Welcome and support the description of the historic environment on site, and the requirement in the supporting text for an archaeological survey, as part of the positive strategy for the historic environment as per NPPF. However, to provide appropriate protection for heritage assets, the requirement for an archaeological survey should be included in the policy itself, along with a requirement for important archaeological remains or other historic features to be retained in situ wherever possible, or, where not possible, recorded for deposition within a public archive.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> No comments received <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> No comments received <p><u>Other organisations</u></p> | <p><i>I: Criterion I(e): Should include greater flexibility, rather than referring to the FRA for the current planning permission. That may not be suitable for a new scheme. Amend as follows: ‘A comprehensive approach to flood risk management will be adopted and development will be undertaken in accordance with the recommendations of an agreed Flood Risk Assessment’.</i> R: The proposed change has been made to the submitted Schedule of Changes.</p> <p><i>I: Unclear why all roofs should be green roofs, would support some being used for solar thermal / photovoltaic generation.</i> R: This is in line with the permitted scheme of for the site.</p> <p><i>I: The current permission on site is for large corporate warehouses for high rent; this does not replace the type of employment space being lost from North Street, i.e. low cost, flexible multi-use warehouses housing social enterprises, start-ups, light industry and creative businesses. This is reflected in low take up of the new space by North Street businesses. Policy should direct the construction of space that more directly replaces that being lost.</i></p> |

Policy SD80: Malling Brooks, Lewes

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

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| <ul style="list-style-type: none">• Unclear why all roofs should be green roofs, would support some being used for solar thermal / photovoltaic generation. (Lewes District Green Party)• The current permission on site is for large corporate warehouses for high rent; this does not replace the type of employment space being lost from North Street, i.e. low cost, flexible multi-use warehouses housing social enterprises, start-ups, light industry and creative businesses. This is reflected in low take up of the new space by North Street businesses. Policy should direct the construction of space that more directly replaces that being lost. (Lewes District Green Party) <p><u>Individuals</u></p> <ul style="list-style-type: none">• No comments received | <p>This is in line with the permitted scheme of for the site.</p> |
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South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD8I: West Sussex County Council Depot and former Brickworks site, Midhurst

There were a total of 15 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u></p> <p>Historic England: Would prefer to see reference to Heritage Impact Assessment or Archaeological Assessment or both, with important archaeological remains or other historic features retained in situ wherever possible, or, where not possible, recorded for deposition within a public archive.</p> <p>Southern Water: Assessment reveals that there is underground water supply infrastructure within the site that would require an easement, and may affect the site layout or require diversion. Additional local sewerage infrastructure would be required to accommodate the proposed development (involving making a connection to the sewerage networks at the nearest points of adequate capacity). Request that the need for additional infrastructure at specific sites is recognised within the policy, and a policy requirement for future access for maintenance and upsizing purposes.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Support part (e) regarding the household recycling facility (HRF), however it should clarify that it is the ‘waste disposal’ authority who will need to approve retention or relocation. To accord with Policy SD43, (e) should also state “of <u>at least</u> equivalent standard”. Supporting text should recognise the HRF as an important community facility for Midhurst. (West Sussex County Council) | <p><i>I: Historic England would prefer to see reference to Heritage Impact Assessment or Archaeological Assessment or both.</i> R: Policy SD12: Historic Environment requires submission of a Heritage Statement with all applications proposing development that may affect a heritage asset (whether designated or non-designated). Policy SD16: Archaeology requires this statement to contain sufficient information to assess the significance of any archaeological asset and the effect on the significance of that asset.</p> <p><i>I: Southern Water seek policy requirement for an easement to access underground water supply infrastructure.</i> R: A development brief for the site has been prepared (SS 06) which will consider layout and access issues. In line with standard practice, the matter will also be considered at planning application stage.</p> <p><i>I: Part 1(e) of the policy should refer to the ‘waste disposal’ authority and refer to a facility ‘of at least equivalent standard’.</i> R: It is for the planning authority, in consultation with relevant partners, to determine whether the policy requirements are met. It is considered that the wording as currently drafted is appropriate.</p> <p><i>I: Policy should require employment uses specifically rather than ‘complementary uses’, in addition to residential / should be considered for retail use.</i></p> |

Policy SD8I: West Sussex County Council Depot and former Brickworks site, Midhurst

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Policy should require employment uses specifically rather than ‘complementary uses’, in addition to residential which is supported. These should take form of a small development of 6-12 industrial units to accommodate local caterers, craftsmen and other service providers. Policy should be far more positive about retention and possible expansion of the HRF to accept inert waste, to tackle fly-tipping (future and current). Site boundary should be adjusted to include whole of brickworks site. (Midhurst TC) HRF provides important local facility to a wide catchment area; should redevelopment proceed, a relocated HRF must be relocated and open before the existing facility is closed, and be at least equal in terms of facilities and capacity. (Cocking PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> The concept plan makes assumptions about the form of development that are unreasonable without a detailed planning and design exercise and consultation with the landowners, and should be removed from SD81. Policy should refer to ‘90 or more dwellings’ as the number being delivered by the site. (Cowdray Estate Office, West Sussex County Council and Cowdray Estate) A historic Flood Risk Assessment has been prepared for the southern part of the site; this and the Strategic Flood Risk Assessment (SFRA) concludes no historic flooding within the site area. Reference to risk of surface water flooding should be removed. (West Sussex County Council and Cowdray Estate) Proposed allocation should be deleted and land south of Barlavington Way instead allocated, as the latter scores better against the SDNPA’s sustainability objectives. (ICS Estates Ltd.) Brickworks site might be more suited to retail use. Local re-siting of HRF important. Development would provide better buffer to | <p>R: It is considered that the use on this site should be primarily residential. There is an adjacent existing employment site, and an allocation for new employment in the nearby village of Stedham. The term ‘complementary uses’ allows flexibility for other uses on the site which could include employment and/or small-scale retail.</p> <p><i>I: Concern over potential loss of the HRF.</i> R: The policy, in part I(e), makes clear that any loss of the HRF from the site will not be permitted unless an equivalent facility is provided.</p> <p><i>I: Policy should be far more positive about retention and possible expansion of the HRF to accept inert waste.</i> R: It would not be appropriate to plan for expansion of the HRF, given its location close to residential areas.</p> <p><i>I: The concept plan is premature and should be removed.</i> R: The concept plan has been removed in the Schedule of Changes (SDNP 01.1).</p> <p><i>I: The policy should refer to ‘90 or more dwellings’.</i> R: Policy SD81 is designed to ensure an appropriate scale of development, which makes efficient and appropriate use of land, and has regard to the opportunities and constraints presented by the site. It is not considered necessary to change the range of homes to be delivered. <i>Reference to risk of surface water flooding should be removed.</i> Environment Agency records suggest there is a risk of surface water flooding. It is considered that this reference is therefore appropriate.</p> <p><i>I: Proposed allocation should be deleted and land south of Barlavington Way instead allocated, as the latter scores better against the SDNPA’s sustainability objectives.</i></p> |

Policy SD81: West Sussex County Council Depot and former Brickworks site, Midhurst

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>Midhurst Common. Compulsory purchase of low-grade commercial units in Station Road should be considered. There is a case for higher than normal affordable housing provision. (The Midhurst Society)</p> <p><u>Individuals</u></p> <ul style="list-style-type: none"> • Concern over potential loss of HRF. Policy should require retention of the HRF or relocation within the Midhurst area. (several individuals) • Access to the site should be from Station Road not Bepton Road. • Development would lead to increased noise and pollution on Bepton Road which is a few feet from the rear boundaries of properties in Heathfield Park. | <p>R: The Depot and Brickworks site is a previously developed and underused site that relates well to the existing settlement. See also SDNPA response on Omission Sites.</p> <p><i>I: Access should be from Station Road not Bepton Road.</i></p> <p>R: Design and layout issues are being considered as part of the preparation of a development brief.</p> <p><i>I: Development would lead to increased noise and pollution on Bepton Road.</i></p> <p>R: Mitigation measures to address impacts on the amenity of nearby residents is a detailed matter that would be considered at the design stages. It is not considered that these will be severe given the various requirements set out in Policy SD8I and other policies in the Local Plan.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD82: Holmbush Caravan Park, Midhurst

There were a total of 6 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u></p> <p>Environment Agency: Currently policy is unsound as it is not sufficiently effective in managing flood risk. Policy should require all development to be located in Flood Zone 1, and require flood compensation storage in relation to any ground raising or built development in fluvial Flood Zone 3 (including allowance for future climate change).</p> <p>Southern Water: Assessment reveals that there is underground water supply infrastructure within the site that would require an easement, and may affect the site layout or require diversion. Additional local sewerage infrastructure would be required to accommodate the proposed development (involving making a connection to the sewerage networks at the nearest points of adequate capacity). Request that the need for additional infrastructure at specific sites is recognised within the policy, and a policy requirement for future access for maintenance and upsizing purposes.</p> <p><u>Borough, City, County and District Councils</u></p> <p>No comments received.</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> The Authority is to be commended on their approach to this site. (Midhurst TC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Previous planning permission for 89 dwellings was never progressed due to numerous site technical constraints, especially flooding constraints (much of site is | <p><i>I: Currently policy is unsound as it is not sufficiently effective in managing flood risk. Policy should require all development to be located in Flood Zone 1.</i> R: The submitted Schedule of Changes (SDNP 01.1) includes a change to part 1(c) of the policy to require that all development is located in Flood Zone 1.</p> <p><i>I: Southern Water seek policy requirement for an easement to access underground water supply infrastructure.</i> R: A development brief for the site is being prepared which will consider layout and access issues. In line with standard practice, the matter will also be considered at planning application stage.</p> <p><i>I: Previous planning permission for 89 dwellings was never progressed due to numerous site technical constraints. Allocation should be deleted and land south of Barlavington Way instead allocated.</i> R: There are not considered to be any overriding technical constraints that prevent redevelopment of the site, which is previously developed land, sustainably located and currently vacant. See also SDNPA response on Omission Sites.</p> <p><i>I: The site could accommodate a supermarket.</i></p> |

Policy SD82: Holmbush Caravan Park, Midhurst

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>in Flood Zone 3). Allocation should be deleted and land south of Barlavington Way instead allocated. (ICS Estates Ltd.)</p> <ul style="list-style-type: none">• Well-designed residential development welcomes provided wildlife is sensitively relocated, a case can be made for a higher than normal level of affordable housing. Due to blind bend on The Fairway and concern over traffic level, a full traffic impact assessment is also required. The site could accommodate a supermarket which, due to the topography, would not be visually intrusive. (The Midhurst Society) <p><u>Individuals</u> No comments received.</p> | <p>R: It is considered that the site is best suited to residential development.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD83: Land at The Fairway, Midhurst

There were a total of 4 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u> Historic England: Welcomes and supports criterion 1 b) of Policy SD83 as part of the positive strategy for the conservation and enjoyment, and a clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.</p> <p><u>Borough, City, County and District Councils</u> No comments received.</p> <p><u>Parish and Town Councils</u> No comments received.</p> <p><u>Other organisations</u></p> <ul style="list-style-type: none"> This section of The Fairway is narrow and on-street parking causes a hazard to passing traffic. The entrance to the Holmbush Caravan Park site is opposite. Removal of existing car parking facilities should be resisted. (The Midhurst Society) <p><u>Individuals</u></p> <ul style="list-style-type: none"> The proposed site provides car parking for existing flats at Brisbane, Adelaide & Perth Houses, including for visitors. There are already too few car parking spaces allocated for existing residents, leading to overspill parking on The Fairway which is a busy and dangerous section of road, with an increase in traffic expected if Holmbush Caravan Park is developed. The | <p><i>I: Concerns over highway safety.</i> R: The site is already used as a residential car park accessed from The Fairway. It is not considered that the additional development will cause highway safety issues, however any such concerns will be addressed at the planning application stage.</p> <p><i>I: Removal of existing parking should be resisted. Further pressure may impact on highway safety.</i> R: Part 1(c) of the policy makes clear that existing parking should be appropriately replaced, with additional parking to serve the new residential units.</p> <p><i>I: The Plan suggests removal of green space which is regularly used by residents.</i> R: There is a small area of green verge that falls within the site boundary. However the larger area of green amenity land falls outside the boundary and will therefore be retained.</p> <p><i>I: Views from existing flats will be severely altered and screening lost, due to extension of car parking and potential removal of shrubs/garden.</i> R: Most new development will change views for existing residents. However policies within the Local Plan (e.g. Policy SD5: Design) require high quality landscaping and other mitigation to ensure that local character is respected and enhanced.</p> |

Policy SD83: Land at The Fairway, Midhurst

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>Plan suggests removal of green space which is regularly used by residents. (2 individuals)</p> <ul style="list-style-type: none">• Views from existing flats will be severely altered and screening lost, due to extension of car parking and potential removal of shrubs/garden, which would be an invasion of privacy and impact on wildlife. | |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD84 Land at Lamberts Lane, Midhurst

There were a total of 7 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u></p> <p>Historic England: Welcomes and supports criterion 1 b) of Policy SD84 as part of the positive strategy for the conservation and enjoyment, and a clear strategy for enhancing, the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework. Would prefer to see reference to Heritage Impact Assessment or Archaeological Assessment or both, with important archaeological remains or other historic features retained in situ wherever possible, or, where not possible, recorded for deposition within a public archive.</p> <p>Southern Water: Additional local sewerage infrastructure would be required to accommodate the proposed development (involving making a connection to the sewerage networks at the nearest points of adequate capacity). Request that the need for additional infrastructure at specific sites is recognised within the policy.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Support, subject to satisfactory Road Safety Audits being carried out prior to the Local Plan Examination. (West Sussex County Council) <p><u>Parish and Town Councils</u></p> <p>No comments received.</p> <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Support. Opportunity should be taken to establish improved pedestrian access to open countryside, connecting with permissive and statutory rights of way across Cowdray Estate and National Trust lands. (South Downs Society) | <p>**Note: Full planning permission has been granted for 20 dwellings on this site. Decision issued 18 June 2018.**</p> <p>I: Historic England would prefer to see reference to Heritage Impact Assessment or Archaeological Assessment or both. R: Policy SD12: Historic Environment requires submission of a Heritage Statement with all applications proposing development that may affect a heritage asset (whether designated or non-designated). Policy SD16: Archaeology requires this statement to contain sufficient information to assess the significance of any archaeological asset and the effect on the significance of that asset.</p> <p>I: Request reference to need to connect to water and sewerage network. R: This is considered to be a detailed matter to be dealt with at the development management stage.</p> <p>I: Satisfactory Road Safety Audits to be carried out prior to the Local Plan Examination. R: This comment is considered to have been superseded by the granting of planning permission for residential development on this site.</p> |

Policy SD85 Land at Park Crescent, Midhurst

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none">• Site should be reassessed to ensure that the existing biodiversity value has been properly considered. Policy should be reworded to ensure a consistent approach to assessments and net gains, with all allocations including a requirement for up-to-date ecological information and conservation and enhancement of biodiversity. (Sussex/Hampshire Wildlife Trust)• Impact on heavy traffic on North Street, and additional parking pressures on Lamberts Lane, must be resolved before units are permitted. An alternative use of a small park or arboretum would be a useful local amenity. No proposal should be permitted unless a non-motorised vehicle route is reinstated, to replace footpath to Whip Hill when playing fields were developed. (The Midhurst Society) <p><u>Individuals</u> No comments received.</p> | |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD85 Land at Park Crescent, Midhurst

There were a total of 3 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u> No comments received.</p> <p><u>Parish and Town Councils</u> No comments received.</p> <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • Support allocation, which is available, sustainably located and achievable. (Metis Homes) • Support allocation. opportunity should be taken to establish improved pedestrian access to open countryside, connecting with permissive and statutory rights of way across Cowdray Estate and National Trust lands. • Impact on heavy traffic on North Street, and additional parking pressures on Lamberts Lane, must be resolved before units are permitted. An alternative use of a small park or arboretum would be a useful local amenity. No proposal should be permitted unless a non-motorised vehicle route is reinstated, to replace footpath to Whip Hill when playing fields were developed. (The Midhurst Society) <p><u>Individuals</u> No comments received.</p> | <p><i>I: Impact on heavy traffic on North Street, and additional parking pressures on Lamberts Lane, must be resolved before units are permitted.</i> R: The Site Allocations Highways Assessment (SS 04) assessed the site as having no overriding highways-related constraints. A Transport Statement will be required (as set out in paragraph 9.180) at the planning application stage to address local highways and parking issues.</p> <p><i>I: An alternative use of a small park or arboretum would be a useful local amenity.</i> R: This is not considered to be deliverable. Residential use is considered appropriate for this site.</p> <p><i>I: No proposal should be permitted unless a non-motorised vehicle route is reinstated, to replace footpath to Whip Hill when playing fields were developed.</i> R: This is not considered deliverable given surrounding land parcels outside of the allocation site are privately owned.</p> |

Policy SD85 Land at Park Crescent, Midhurst

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD86: Offham Barns, Offham

There were 2 responses to this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>Specific consultation bodies – national agencies and utility providers</u></p> <ul style="list-style-type: none"> No comments received <p><u>Specific consultation bodies – other local authorities</u></p> <ul style="list-style-type: none"> No comments received <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> No comments received <p><u>Other organisations and individuals</u></p> <ul style="list-style-type: none"> Inconsistencies amongst the allocations in terms of biodiversity requirements. Reassess site to ensure that existing biodiversity value has been considered. Up-to-date ecological information should be set out in the supporting text. (Sussex and Hampshire Wildlife Trusts) Support allocation, further pitches needed for extended family. Gypsy & Traveller family with long connections to local area. (Heine Planning) | <p><i>I: Policy should include a requirement for enhancements to biodiversity.</i></p> <p>R: Policy SD9 and supporting text (in particular paragraph 5.72) sets out requirements for all development to conserve and enhance biodiversity, and to provide appropriate information and evidence on potential impacts to wildlife sites.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD87: Land at Church Lane, Pyecombe

There were a total of 2 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National Agencies</u></p> <ul style="list-style-type: none"> No comments received. <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> No comments received. <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> No comments received. <p><u>Other organisations</u></p> <ul style="list-style-type: none"> The land within the northern part of the allocated site which is yet to be developed could accommodate a further 5 dwellings. This should be reflected in policy SD87 (and policy SD26 with the allocation increased to at least 14 dwellings; especially given that in the Mid Sussex Local Plan it was allocated for 20 dwellings. (DMH Stallard LLP) Consider that there are sustainability and deliverability issues with the proposed allocation and that the site at Barlavington Way, Midhurst which performs better in sustainability terms should be allocated instead. (ICS Estates Ltd.) <p><u>Individuals</u></p> <p>No comments received.</p> | <p><i>I: The land within the northern part of the allocated site could accommodate a further 5 dwellings. This should be reflected in policy SD87 with the allocation increased to at least 14 dwellings</i></p> <p>R: Planning permission was granted for this site in 2016 (SDNP/15/04137/FUL) for 8 dwellings which has now been completed. It is therefore proposed in the submitted Schedule of Changes to delete this policy allocation and supporting text from the Local Plan (page 43). The undeveloped land adjacent to the north of this site is included within the settlement boundary. Therefore the principle of development is acceptable here and the remaining land could in any case come forward for development as a windfall site subject to complying with relevant Local Plan policies.</p> |

Policy SD87: Land at Church Lane, Pyecombe

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD88: Land at Ketchers Field, Selborne

There were a total of 19 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u> Natural England: The accompanying text to the policy states that the site is located 290 metres from the Wealden Heath Special Protection Area. Natural England would advise a check on this as we believe this should be referring to East Hampshire Hangers SAC and not Wealden Heaths SPA. East Hampshire Hangers SAC is the nearest European site to Ketchers field and Ketchers field falls within the 5km zone of Wealden Heaths Phase II SPA.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Selborne Footpath 504 runs along the site's access road. Welcome point 1.c) and 2.a) to protect and enhance the right of way. (Hampshire CC) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Minor wording and policy changes suggested regarding protection of the stream to the north, the Right of Way, access to recreation ground, indigenous species planting, and grammatical correction. (Selborne PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> The proposed allocation of Land at Park Lane, Droxford should be deleted and the land south of Barlavington Way, Midhurst should be allocated for development instead. (ICS Estates Ltd.) The proposed allocation of the Ketchers Field site at Selborne is unsound and flawed and should be withdrawn, because there is no agreed means of vehicular access and the possible alternative means of access through the | <p><i>I: The accompanying text to the policy states that the site is located 290 metres from the Wealden Heath Special Protection Area. Natural England would advise a check on this as we believe this should be referring to East Hampshire Hangers SAC and not Wealden Heaths SPA. East Hampshire Hangers SAC is the nearest European site to Ketchers field and Ketchers field falls within the 5km zone of Wealden Heaths Phase II SPA</i> R: Wording corrected as set out in the Post-Submission Schedule of Changes.</p> <p><i>I: Minor wording and policy changes suggested regarding protection of the stream to the north, the Right of Way, access to recreation ground, indigenous species planting</i> R: These points are generally covered by the policy/supporting text (for example evidence studies paragraph 9.193 includes Surface Water Flood risk Assessment and Management Plan) or by other policies in the Local Plan (for example policy SD11 sets out further details on appropriate new planting of trees or hedges).</p> <p><i>I: No agreed means of vehicular access and the possible alternative means of access through the adjacent Ketchers Field is outside the control of the site owners and cannot be relied on.</i></p> |

Policy SD88: Land at Ketchers Field, Selborne

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>adjacent Ketchers Field is outside the control of the site owners and cannot be relied on. (Newton Valance Farm)</p> <ul style="list-style-type: none"> • The development of the Land at Ketchers Field is unsustainable (due to remoteness from existing village services) and undeliverable (due to constrained access), likely to result in a bland and urbanising form of development which would conflict with the Statutory Duties of the National Park. The alternative site Under the Hill is more sustainable and would offer substantial community benefits, and should instead be allocated. (Village Green Investments) <p>Individuals</p> <ul style="list-style-type: none"> • Support allocation. (several individuals) • Welcome incorporation of village design statement, Village Plan and local landscape character assessment. Concern over traffic levels. • The land in question is on the periphery and would put less mobile people out of reach of the village shops etc. • The new homes should be built within Passivhaus guidelines. • Unsuitable for development as further development would have an adverse impact on the existing households. | <p>R: Vehicular access is understood to be from the north-west corner of the site subject to some works to make suitable for the range of users.</p> <p><i>I: Unsustainable (due to remoteness from existing village services) and likely to result in a bland and urbanising form of development which would conflict with the Statutory Duties of the National Park</i></p> <p>R: The village of Selborne is considered to have sufficient village services for some modest new development. These new residents add to the customer base to provide continued support to these village services. Local Plan policy SD5 sets out the requirements for landscape-led design in the National Park, which includes respecting the local character and making a positive contribution to the character of the area.</p> <p><i>I: The new homes should be built within Passivhaus guidelines</i></p> <p>R: The Local Plan should be read as a whole. Policy 48 sets the sustainable construction requirements.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD89: Land at Pulens Lane, Sheet

There were a total of 78 responses to this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><i>To note: Within Sheet, the site is also known as Stocklands.</i></p> <p><u>Specific consultation bodies – national agencies and utility providers</u></p> <p>Environment Agency suggest policy wording be strengthened to refer to 20m buffer strip and flood compensation storage.</p> <p>Historic England seek requirement for Heritage Impact Assessment / Archaeological assessment in policy.</p> <p><u>Specific consultation bodies – other local authorities</u></p> <p>Hampshire County Council support a new footpath across the site linking to Petersfield footpath 502.</p> <p><u>Parish and Town Councils</u></p> <p>Sheet Parish Council consider SD89 is unsound because:</p> <ul style="list-style-type: none"> ○ Beyond existing settlement boundary ○ Follows the bank of the River Rother, vulnerable to pollution and banks easily degraded. ○ Adjoining woodland is a SINC, consider the meadow of equal importance ○ Site and access at risk of surface water flooding. Environmental impact of embankments not considered. ○ Otters recorded up-stream. ○ Invaluable buffer between existing homes and the River Rother which is significant local landscape importance. ○ Conflicts with purposes of National Park. ○ Increase car use, should be considered cumulatively with 80 homes on Penns Place, Petersfield. | <p><i>I: Other sites would be more suitable</i></p> <p>R: This site fits with the approach to development set out in Chapter 7a of the Submission Local Plan and Strategic Policy SD25: Development Strategy. Background Papers provide further information on the Development Strategy (TSF 02), Sites and Settlements (SS01). The Sites and Settlements: Route Map for Housing Allocations (SS02) explains why the site was chosen over alternatives.</p> <p><i>I: Access to the site is not achievable</i></p> <p>R: The SDNPA believes there is a strong prospect of achieving a suitable access to the site, either by improving the existing access for a small amount of development, or providing a new access through the acquisition of third party land.</p> <p><i>I: Development will result in an unacceptable impact to the river environment</i></p> <p>R: Statutory and local wildlife bodies are content that the impacts could be mitigated subject to a reduction in the level of development and an increased setback of the development envelope away from the riverbank. The Submitted Schedule of Changes (p44) notes that the SNDPA is producing a development brief for the sites and that any proposals should be</p> |

Policy SD89: Land at Pulens Lane, Sheet

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> ○ Pulens Lane is overloaded with traffic, speeding, numerous residential exits, blind corners, poor or absent footpaths, and heavy use by pedestrian. No marked pedestrian crossings and no traffic calming measures. The presence of schools nearby accentuates the problems. Junction of Pulens Lane and the London Road, Durford Road and Heath Road congestion at peak periods of the day. ○ No account of the impact on infrastructure in conjunction with allocations in Petersfield. ○ Reduces distinct village identity. ○ Site previously subject to an independent Inspectors report and rejected. <p>Rogate Parish Council offered no comments on this policy. Petersfield Parish Council consider that Pulens Lane is already a busy route and that will increase if the allocations in the Petersfield NPP come forward. Concerns about the impact on the Rother and also the Rotherlands nature reserve. Infrastructure and CIL should benefit Petersfield Town.</p> <p><u>Other organisations and individuals</u></p> <p>Landowners Support for the allocation and the development brief. Believe site is deliverable and will work with the SDNPA to achieve this. Request that site layout pays particular attention to existing properties and the sensitivity of the River Rother corridor.</p> <ul style="list-style-type: none"> • Allocation is inconsistent with Policies SD1, SD3, SD9, SD17, SD25 • Allocation is inconsistent with the refusal of a scheme on this site in 2016. • Support allocation however alterations recommended relating to terminology and the need to allow for proper masterplanning through the Development Brief and Planning Application processes. • Unclear how the position of the settlement boundary has been determined with no apparent connection with the settlement boundary methodology. Settlement boundary should be redrawn. • Description of allocation as mixed-use is incorrect, it is a residential scheme with open space / natural areas provided. Term 'open-space' can be misinterpreted as park or play area. | <p>accompanied by Access, Landscape and Ecological improvement strategies. Further proposed changes are set out in the Post-Submission Schedule of changes in response to the Development Brief.</p> <p><i>I: Historic England would prefer to see reference to Heritage Impact Assessment or Archaeological Assessment or both</i></p> <p>R: Policy SD12: Historic Environment requires submission of a Heritage Statement with all applications proposing development that may affect a heritage asset (whether designated or non-designated). Policy SD16: Archaeology requires this statement to contain sufficient information to assess the significance of any archaeological asset and the effect on the significance of that asset.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> • Objection / complaint over allocation, consider it should be deleted from plan (various individuals) • Allocation of site for housing rejected in EHDC Local Plan in 1995 for environmental and traffic reasons, and the erosion of visual quality of river landscape. Development would damage hydrology, disrupt springs. (various individuals) • Application for 5 homes on site recently refused for environmental / ecology reasons, contrary to policy. (various individuals) • Allocation contrary to NPPF and policies within the Submission South Downs Local Plan including SD3 Major Development as not demonstrated that it is in public interest. (various individuals) • Allocation follows banks of River Rother. Development is contrary to first purpose of National Park and could risk pollution of the river (like Tilmore Brook). Sandy river bank is vulnerable and will be eroded by increased use (children / dogs). Increasing access to river will damage flora and fauna. Lead to littering (various individuals) • Adjoining woodland is a SINC, buffer significantly reduced, increase disturbance and damage. Damage ancient and wet woodland. (various individuals) • The meadow should be classified as a SINC (various individuals) • Harm to biodiversity including bats, otters (recorded up stream) • Sheet is already contributing houses. Allocated 21 homes by 2025, 18 under construction. 32 further homes will take total to 50 in the village. (various individuals) • Cumulative impact of 82 homes to be built on nearby Penns Field. Traffic issues already significant. Increase pollution. Increased risk of accidents, risk to safety of pedestrians. Increased traffic, road used as cut through. Junction improvements needed on the London Road junction, issues already exist. Local roads not suitable for emergency vehicles. School close by. Pulens Lane narrow, congested, poor visibility. Regular speeding. Site access rated as poor in Highways Assessment Report (March 2017). Close proximity to schools. (various individuals) • No obvious access to site, needs demolition of house on Pulens Lane. Current entrance is narrow, single file traffic. Site not deliverable and is therefore inconsistent with the NPPF. (various individuals) | |

Policy SD89: Land at Pulens Lane, Sheet

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> • Reduce size of allocation to 5/6 homes. • Cumulative impact. Merge Sheet with Petersfield. Loss of village character. • No increase in infrastructure in local area to accommodate needs of the development, in particular schools and surgeries. (various individuals) • Site at risk of flooding, including drainage ditch, requires major work on river environment. Risk will increase with climate change. Development will impact on natural water movements. Surface water run-off damages roads and driveways. (various individuals) • Harms landscape character. (various individuals) • Conflicts with Objective 8 of the Local Plan – to protect and provide for the social and economic wellbeing of National Park communities supporting local facilities. • Consider land south of Barlavington Way, Midhurst performs better in sustainability terms and should be allocated instead of Pulens Way. • Suggest allocate some of plots for self-build • Allocate some of site for allotments | |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD90: Land at Loppers Ash, South Harting

There were a total of 56 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National Agencies</u></p> <ul style="list-style-type: none"> No comments received <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> No comments received <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Delete the proposed allocation and replace with the brownfield site proposed by Harting PC. (Harting PC) Not legally compliant: there has been no consultation on the 60% increase in the site, (which was also not proposed in the SHLAA), as per Reg 18. The Gunning Principles (2.1-2.3) have been ignored. (Harting PC) The PC reluctantly supported the previous version of the site subject to landscape and traffic concerns being adequately addressed and the number reduced to 6. (Harting PC) The area of the site has been increased by 60% without consultation. Its development will not respect the traditional layout of a typical village edge but will encroach well into an arable field. It will be highly visible from the South Downs Way. The site is on a single-track historic rural road, the traffic on which would at least double thus impacting on the recreational value of this much-used pedestrian route to the Downs. (Harting PC) By contrast the brownfield site proposed by Harting PC would have no impact on the wider landscape, and would provide at least as many homes as SD90 and SD91 combined. (Harting PC) | <p><i>I: Delete the proposed allocation and replace with the brownfield site proposed by Harting Parish Council. Alternative site would have no impact on wider landscape.</i> R: There has been no such alternative site submitted to the SDNPA whilst the Plan was being prepared. The allocation site at Loppers Ash is considered to be suitable and available.</p> <p><i>I: Object to a c. 60% increase in the site area compared with the Preferred Options Local Plan. This would lead to an out-of-character expansion of the village boundary and form.</i> R: The site area has reverted back to its original area. See submitted Schedule of Changes Appendix 4 (SDNP 01.1).</p> <p><i>I: Previous support based on a site capacity of 6 dwellings.</i> R: The site is allocated for 6-8 dwellings. This allows some flexibility and ensures the best use of the land suitable for development to provide small to medium dwellings.</p> <p><i>I: New housing is not supported in Harting village. Settlement Facilities Study gives the settlement a low rating.</i> R: The Local Plan is based on a medium level of development dispersed across the settlements of the National Park. South Harting is a village served by shops, school and other community facilities. The Settlement Facilities Study (TSF 01) places the village within the top 20 settlements in the National Park in terms of</p> |

Policy SD90: Land at Loppers Ash, South Harting

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>Other organisations</p> <ul style="list-style-type: none"> Not aware of any sentiment in favour of new housing in the village. Any suggestion that new housing might include genuinely affordable units is met with scepticism born of experience. (Harting Society) The proposal would have an adverse impact on views of and from the South Downs. (Harting Society) No effective consultation on the justification for the increase in the site. The proposal to 'bulge out' the site away from the lane seems particularly out of character and would create a mini-estate whose only access to a proper road is via an ancient single-track lane with banks and no passing places. (Harting Society) Propose deletion of the site due to clear adverse impacts on landscape and the low rating of the village in the SFA, and its replacement with allocation of land south of Barlavington Way, Midhurst. (ICS Estates) Evidence base supporting the allocations is insufficient. Ecosystem services approach does not seem to have fed into site selection, but was retrofitted afterwards. Site allocations should be reassessed, including with on-the-ground ecological to ensure existing biodiversity value is properly considered. Inconsistent approach to biodiversity between the different allocations. All allocation policies (not supporting text) should include a requirement for up-to-date ecological information and conservation and enhancement of biodiversity. Allocations containing ecosystem services symbols should contain a caveat in the policy to ensure that enhancements to natural capital are not limited to those requirements listed specifically in the policy. (Wildlife Trusts) <p>Individuals</p> <p>Procedural issues</p> <ul style="list-style-type: none"> Site was supported at Preferred Options stage subject to concerns being addressed; this has not happened (CDC councillor) No justification provided for increasing the area of the site from Preferred Options. Lack of consultation on this extended site means it fails to meet | <p>settlement facilities (with a score of 6.5). A modest amount of housing growth of approximately 13 dwellings over the Plan period is therefore appropriate.</p> <p><i>I: There are clear adverse impacts on landscape. Site would be highly visible from popular Harting Hill and a wide stretch of the South Downs Way and would degrade visual integrity, identity and scenic quality; introduce urbanising elements; be overly dense; require removal of large area of bank to detriment of local character.</i></p> <p>R: The landscape assessment (see SS 02 Appendix 2) concludes the site has medium landscape sensitivity, and that careful development with density to mirror existing and adjacent properties would not appear incongruent. It also notes that views from the ridge of the Downs are unlikely to be significantly affected due to the site being seen in the context of surrounding dwellings. However additional supporting text has been added to reinforce the importance of respecting downland views and landscape sensitivity (see submitted Schedule of Changes, amendments to paragraph 9.206).</p> <p><i>I: Site should be reassessed to ensure that the existing biodiversity value has been properly considered, and include a requirement for up-to-date ecological information and conservation and enhancement of biodiversity.</i></p> <p>R: Policy SD9 and supporting text (in particular paragraph 5.72) sets out requirements for all development to conserve and enhance biodiversity, and to provide appropriate information and evidence on potential impacts to wildlife sites.</p> <p><i>I: Concerns expressed over provision of green space / allotments as part of development. The parish already has</i></p> |

Policy SD90: Land at Loppers Ash, South Harting

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>legal requirements (Gunning/Sedley principles). NPA unresponsive to HPC concerns raised through consultation (various individuals including CDC councillor)</p> <ul style="list-style-type: none"> Site is in conflict with Purpose 1 and the NPA's Duty to communities (CDC councillor) <p>Landscape issues</p> <ul style="list-style-type: none"> ref. appeal refusal APP/Y9507/D/16/3145623 for a shed in garden adjacent to the site, on landscape grounds. (CDC councillor) Mentions need to protect views of the South Downs, but not from the South Downs- site would be highly visible from popular Harting Hill and a wide stretch of the South Downs Way and would degrade visual integrity, identity and scenic quality from that viewpoint- The view across the site from the Downs encompasses natural beauty beyond the site, increasing the impact of the proposals. (various individuals including CDC councillor) Site provides expansive views of the South Downs across farmland for NP users. Development would harm these views, create intrusion, and detract from character by introducing urbanising elements. Not justified, positively prepared or consistent with SD4 (various individuals) Proposals would degrade the visual integrity, identify and scenic quality of the east side of the village. Development would be denser than that in the surrounding area. If the enlarged (eastern) area of the site is used for building or car parking, the landscape would be further degraded. (various individuals) Achieving visibility at the New Lane/Elsted Road junction would require removal of a large area of bank, with significant adverse landscape impact. Views from PROW from the village will be impacted. The SA states the site has 'uncertain' landscape and cultural heritage impacts. its allocation is therefore not landscape led and contradicts the first purpose of the NP Dwellings cannot be built on the site without a negative impact on the landscape, therefore the allocation is not led by landscape capacity. (CDC councillor) | <p>sufficient allotments, and there is other local green space close to the site.</p> <p>R: As the site area has now been reduced, the requirement to provide public or community green space on the site has been removed. See change to paragraph 9.205 in the submitted Schedule of Changes (SDNP 01.1).</p> <p>I: Site conflicts with Policy SD21 on historic rural roads. Would increase traffic movements on New Lane by more than 10%. The impact of creating the entrance and necessary splays will have an unacceptable impact. Also historically important and greatly used for recreation. Limited visibility / concern over access to new properties, and regarding impact on South Acre.</p> <p>R: Development would need to comply with all local plan policies including Policy SD21 on highways design. Supporting text (9.208) includes requirement for highways assessment. Criterion 1(b) requires that development provides all necessary vehicular parking on-site to avoid additional on-street parking.</p> <p>I: Concern that new dwellings will not be affordable, or that insufficient affordable dwellings will be provided.</p> <p>R: To comply with Policy SD28: Affordable Homes, the development will be expected to provide 2 or 3 affordable homes. The mix of dwelling types will be such that the dwellings will be predominantly small to medium in size, and therefore more affordable than large dwellings.</p> <p>I: Concerns over surface water flooding, drainage capacity, subsidence issues. There is a Roman Villa in the area and artefacts are still being found in surrounding gardens.</p> |

Policy SD90: Land at Loppers Ash, South Harting

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>Green space</p> <ul style="list-style-type: none"> • A small area of agricultural land within the site is clearly nonsensical (CDC councillor) • the parish already has allotments (CDC councillor) • there is local green space close to the site, including Harting Down (CDC councillor) • the proposed green space would not fully mitigate landscape harm; only a minimal development on the site is possible without landscape harm. • Need more precise layout details, including of the on-site green space, to assess the impact on views. Failure to do this earlier breached the Gunning Principles. (CDC councillor) <p>Streetscape</p> <ul style="list-style-type: none"> • Site conflicts with Policy SD21 on historic rural roads. Would increase traffic movements on New Lane by more than 10% (number of dwellings on the lane would be doubled) and would fail to conserve or enhance the ecological, landscape or recreational value of the lane. (CDC councillor) • The impact of creating the entrance and necessary splays will have an unacceptable impact on this historic rural road and hollow way which is little used by agricultural vehicles due to its width, hence very quiet.. (CDC councillor) • New Lane is the only remaining single track lane in the village, very quiet, pretty and well used for recreation. (various individuals) • New lane is historically a cow herding lane and of significant importance in the history of the village and locality <p>Highways</p> <ul style="list-style-type: none"> • 8 new driveways onto New Lane may cause problems • New Lane/Elsted Road junction has limited visibility, exacerbated by parking; increased development would increase risk to users. (various individuals) • New Lane is the only safe route to Harting Down for non-motorised users; increased motor traffic, with at least 3 new access points, would cause safety and accessibility concerns. (various individuals) | <p>R: No known constraints of these types have been identified. The policies in the Local Plan act to ensure that any such issues are resolved before development commences.</p> <p>I: Proposal would cause loss of good agricultural land. R: The site is 0.6 hectares in size so any such loss would be minimal.</p> <p>I: SDNPA should not allocate sites outside the settlement boundary. R: It has been necessary to allocate some housing just outside existing settlement boundaries, where there are not sufficient sites identified within the boundary, to ensure the objectives of the Local Plan are being met. All such sites are closely related (and generally contiguous to) a settlement.</p> <p>I: Concerns over impact on schools. R: West Sussex County Council has confirmed that, subject to planned increases in places, there is sufficient capacity in local schools to accommodate the development proposed in the Local Plan.</p> <p>I: Proposals would lead to further requests to develop at the southern end of the Lane, which would be a disaster. R: No such plans have been put forward and the Local Plan provides no support for further expansion beyond the revised settlement boundary.</p> |

Policy SD90: Land at Loppers Ash, South Harting

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> • New Lane is too narrow for additional traffic • Danger to South Acre caused by increased traffic and increased car parking. (various individuals) • How can parking be accommodated within a form of development that continued the pattern of development found to north and south. (CDC councillor) • Approach from South Acre into New Lane is hazardous. • Proposal may result on parking on the Midhurst Road / South Acre. Residents of Loppers Ash already park on the Midhurst Road, this would be exacerbated and make the New Lane entrance more dangerous (various individuals) • Propose highways assessment <p>Affordability</p> <ul style="list-style-type: none"> • Due to the attractive views from the site, whatever the style of property, the dwellings built will be too expensive for local working residents. Owners likely to be commuters or second home owners- will not address the needs of the local community. • Market housing will not address the needs of the local community. The community is currently unbalanced in favour of wealthy residents and second home owners- affordable housing needed to balance this. • The development does not propose enough affordable homes. In its current format, all it does is accumulate wealth for the landowner. Any development should be for affordable housing schemes. <p>Drainage</p> <ul style="list-style-type: none"> • New Lane suffers from surface water flooding, development would cause further surface runoff. (various individuals) • Concerns over capacity of drainage system to support additional dwellings. (various individuals) <p>Stability</p> <ul style="list-style-type: none"> • South Acre residents have had subsidence issues due to clay soil; consider carefully. (various individuals) <p>Residential amenity:</p> | |

Policy SD90: Land at Loppers Ash, South Harting

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> • The proposals will have a huge impact on neighbouring amenity <p>Heritage:</p> <ul style="list-style-type: none"> • There is a Roman Villa in the area and artefacts are still being found in surrounding gardens. <p>Agriculture:</p> <ul style="list-style-type: none"> • Proposal would cause loss of good agricultural land (various individuals) • Propose agricultural assessment <p>Proposed criteria</p> <ul style="list-style-type: none"> • Decrease number of properties • Height limitation • Increase parking spaces. <ul style="list-style-type: none"> • Biodiversity: Will have adverse impact on natural habitat. • Settlement boundary- should not allocate sites outside the settlement boundary • Sustainability: SA should not score the impact on accessibility as 'likely positive' but as 'uncertain'; the site is some distance by foot from most facilities and services, along an increasingly busy road with hardly any pavements (CDC councillor) • Infrastructure: Concerns over impact on schools, buses and parking. • No further new housing needed in South Harting due to recent Smithfield development. • Fully supportive of policy criteria (site landowner) • Proposals appears to be based on meeting targets rather than needs, which contradicts the Local plan objectives. • It will be easy in future to extend the cul-de-sac and encroach further into the field. • Views to the Downs from existing houses will be poorer • Proposals would lead to further requests to develop at the southern end of the Lane, which would be a disaster | |

Policy SD90: Land at Loppers Ash, South Harting

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD9I: Land North of the Forge, South Harting

There were a total of 29 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National Agencies</u></p> <p>Historic England: The allocation of this site raises potential concerns for Historic England given its relationship to the South Harting Conservation Area. Historic England wonders if it is actually possible for any development on this sensitive site to preserve, let alone enhance, the setting of the Conservation Area. However, they must assume that criterion (a) requiring such preservation and enhancement will be rigorously adhered to and they accept that, if so, it provides adequate protection for the Conservation Area. Welcome and support descriptions of the historic environment, and requirement for development to be supported by a heritage impact assessment, as part of the positive strategy for the conservation and enjoyment, and a clear strategy for enhancing the historic environment. However, this requirement should be in the policy itself rather than supporting text.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> No comments received <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Proposal would not constitute sustainable development Delete the proposed allocation and replace with the brownfield site proposed by Harting PC. (Harting PC) Not legally compliant: there has been no consultation on the site, as per Reg 18. The Gunning Principles (2.1-2.3) have been ignored. (Harting PC) The site would be 10m deeper than adjacent Conservation Area properties. | <p><i>I: Historic England have concerns regarding its relationship to the South Harting Conservation Area. Criterion (a) requiring such preservation and enhancement will be rigorously adhered to.</i> R: Development proposals on this site will be required to strictly adhere to the policy criteria and supporting text. The Heritage Statement will need to fully justify the approach taken to preserving and enhancing the conservation area. Policy SD15: Conservation Areas sets out comprehensively the requirements for development to achieve this.</p> <p><i>I: Delete the proposed allocation and replace with the brownfield site proposed by Harting Parish Council. The brownfield site proposed by Harting PC would have no impact on the wider landscape.</i> R: There has been no such alternative site submitted to the SDNPA whilst the Plan was being prepared. The allocation site is considered to be suitable and available.</p> <p><i>I: Concerns over landscape impacts, design & layout. The site would be 10m deeper than adjacent Conservation Area properties. The site's density is at least twice that of any other rural allocation in the</i></p> |

Policy SD9I: Land North of the Forge, South Harting

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> Paragraphs 9.209 and 9.210 ignore the evidence from the SDNPA's Landscape Architect and Conservation Officer, in responding to previous planning applications on the site, who both said that any development on the site would cause harm to the landscape and conservation area respectively. Therefore it is not possible for any development on this site to conserve or enhance views from publicly accessible areas or the setting of the conservation area. The site should not be allocated if its landscape impact is uncertain (as per Sustainability Appraisal) The site's density is at least twice that of any other rural allocation in the Plan, and twice the Chichester District Council benchmark, and the dwellings per metre of site frontage is from 2.5 to three times that in the adjacent conservation area. Following the development of the Forge site across the road, also within the setting of the CA and listed buildings, further development would have a negative cumulative effect. Development would close off the only entrance to the field behind that is practical to use for farm machinery. There are two other entrances but one is not viable due to parked vehicles and the tightness of the turn off the Lane, the other is via a very deep, steep and narrow hollow-way with extremely poor sightlines. Diverting farm vehicles onto these lanes would harm historic rural roads in contravention of Policy SD21. The Forge development opposite contained the required number of on-site parking spaces but still generates off-site parking; such parking causes problems around the village; need to consider cumulative impact from this development. Surface water flooding adjacent to the site is generated by run-off from the site itself and the land beyond. Development may increase local flooding. It is hard to see how a SUDS system could be accommodated on the site itself, and cope with run-off from the field; drainage to the stream must not be an option given the status of the stream corridor as a rare habitat housing reptiles. By contrast the brownfield site proposed by Harting PC would have no impact on the wider landscape, and would provide at least as many homes as SD90 and SD91 combined. (Harting PC) | <p><i>Plan. Development would damage views eastwards along Elsted Road / from the Downs / damage rural character.</i> R: The site boundaries are appropriate to provide sufficient land for a modest number of small dwellings, and appropriate space for gardens, parking and landscaped amenity land, whilst limiting the developed area to the western side away from the stream corridor. The landscape assessment (SS 02, Appendix 2) notes there are existing dwellings adjacent to and opposite the site, and considers it to have medium landscape impact.</p> <p><i>I: SDNPA (landscape officer) has previously objected to a scheme on this site. The scheme was rejected, also on grounds of impact on the conservation area.</i> R: Comments made on a specific scheme or planning application are not the same as an assessment of landscape sensitivity for an appropriately designed scheme. The proposed site boundary limits the extent of development to the less sensitive part of the site. The policy requires development to preserve and enhance the setting of the conservation area.</p> <p><i>I: There is no footway connecting the village centre.</i> R: Streets which lack footways are not uncommon in rural villages. There are existing residential properties in the area, and the site is close to the village centre. There are no significant risks identified in this respect.</p> <p><i>I: Construction would block the main entrance to more than 100 acres of arable land accessed by large</i></p> |

Policy SD91: Land North of the Forge, South Harting

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • Site is enclosed, and terraced/semi-detached cottages- similar density to dwellings to W and S- behind cottage gardens and low walls would blend readily with the street scene while being totally screened from surrounding countryside. Parking would be east of the cottages in a covered 'farmyard' area. Ample room would remain to the east for access to the field to the north. (Elizabeth Lawrence Ltd) • Not aware of any sentiment in favour of new housing in the village. Any suggestion that new housing might include genuinely affordable units is met with scepticism born of experience. (Harting Society) • No effective consultation on the justification for the allocation of the site. The adverse impacts of the site would be increased due to its elevated nature. (Harting Society) • Propose deletion of the site due to clear adverse impacts on landscape and the low rating of the village in the SFA, and its replacement with allocation of land south of Barlavington Way, Midhurst. (ICS Estates) • Evidence base supporting the allocations is insufficient. Ecosystem services approach does not seem to have fed into site selection, but was retrofitted afterwards. Site allocations should be reassessed, including with on-the-ground ecological to ensure existing biodiversity value is properly considered. Inconsistent approach to biodiversity between the different allocations. All allocation policies (not supporting text) should include a requirement for up-to-date ecological information and conservation <i>and</i> enhancement of biodiversity. Allocations containing ecosystem services symbols should contain a caveat in the policy to ensure that enhancements to natural capital are not limited to those requirements listed specifically in the policy. Need to include a requirement for enhancements to biodiversity, in the policy itself. (Wildlife Trusts) <p><u>Individuals</u></p> <p>General</p> <ul style="list-style-type: none"> • Propose no further housing development in South Harting due to recent Smithfield development, south of the proposed site. | <p><i>equipment. Alternative routes are unsuitable for heavy farm traffic.</i></p> <p>R: These matters would be considered in detail in a transport assessment as appropriate.</p> <p><i>I: General concerns over increase in traffic in the village.</i></p> <p>R: The allocation is for 5-6 homes. The additional traffic generated by a development of this size would be de minimis, in relation to traffic impacts beyond the immediate access.</p> <p><i>I: The development does not propose enough affordable homes.</i></p> <p>R: To comply with Policy SD28: Affordable Homes, the development will be expected to provide 1 or 2 affordable homes. The mix of dwelling types will be such that the dwellings will be predominantly small to medium in size, and therefore more affordable than large dwellings.</p> <p><i>I: The proposal does not address surface water flooding risks / drainage issues.</i></p> <p>R: Paragraph 9.126 requires submission of a Surface Water Flood Risk Assessment and Management Plan.</p> <p><i>I: Development would remove the one remaining view of open land from the village centre.</i></p> <p>R: The landscape assessment (SS 02, Appendix 2) identifies that the site has medium landscape sensitivity. Whilst there will be an impact on local views from the street, this is not something that outweighs the overall suitability of the site.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> Inadequate consideration has been given to the cumulative impacts of the two proposed developments in South Harting, in close proximity and near the foot of the Downs; and also to cumulative impact with the recent Forge development opposite (Various individuals) The SDNPA refused permission for infill development on the edge of Petersfield the (SDNP/13/03649/OUT, Land West of 87 Sussex Road), with the appeal against that decision being dismissed. <p>Procedural issues</p> <ul style="list-style-type: none"> Site was excluded by 2014 SHLAA and therefore 2015 Preferred Options Consultation; no previous consultation on the site; inclusion at this stage contradicts Gunning Principles (Various including CDC councillor) No justification for adding the site since Preferred Options has been provided. (Gunning/Sedley principles). NPA unresponsive to HPC concerns raised through consultation (various individuals including CDC councillor) Site is in conflict with Purpose 1 and the NPA's Duty to communities (CDC councillor) <p>Landscape issues</p> <ul style="list-style-type: none"> The allocation does not conform to the first purpose, vision or objectives of the SDNPA regarding landscape (various individuals) No evidence has been provided that the site's negative landscape impacts can be ameliorated. The site is not consistent with an approach to allocations based on landscape capacity; it must be assumed to indicate an approach to allocations led by housing targets. (CDC councillor) Steeply rising land. Development would damage views eastwards along Elsted Road. (Various individuals) Development would damage views from the Downs. Site is particularly important due to arable land coming down to the roadside; this cannot be protected or enhanced by development. Recent housing built across the road; housing on this site would create a 'tunnel effect', damaging the present rural character of the lane. (various individuals) | <p>I: The site is adjacent to the main Dark Night Sky core zone, and would add to the light pollution visible from the village and from the Downs.</p> <p>R: Paragraph 9.213 identifies that the site is immediately to the west of the main core zone for the Dark Night Sky reserve, and that this should be accounted for in design proposals.</p> <p>I: The adjacent area contains much wildlife which would be put at risk by development.</p> <p>R: Development proposals would need to be accompanied by an Ecology Assessment, as set out in 9.126. Policy SD9: Biodiversity and Geodiversity sets out a comprehensive approach to ensuring that biodiversity is not unduly impacted by development.</p> <p>I: Concerns over impact on schools, buses and parking.</p> <p>R: West Sussex County Council has confirmed that, subject to planned increases in places, there is sufficient capacity in local schools to accommodate the development proposed in the Local Plan. Policy criteria 1(c) provides clear protection against potential overspill parking arising from the new development.</p> |

Policy SD9I: Land North of the Forge, South Harting

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> • Because of the height of the site, development there would dominate the dwellings across the road, creating an urban character. • The land is a significant open agricultural space on the east of the village. The topography of the land is visually pleasing. Housing will cut into the natural slope. (Various individuals) • Para 9.21 I: need to consider all views, as well as the setting, not just views eastwards. • Site previously rejected for landscape reasons by SDNPA and prior to that by Chichester District Council- SDNPA landscape architect and conservation officer objected that any development on the site would close significant views to open countryside and harm the conservation area. (Various individuals) • This gap is not only an eloquent survival of the direct connectivity of pre-industrial settlements to their agricultural hinterlands, but it also contains the narrow end of a plot of unploughed damp meadow of a kind that is exceedingly rare on the fertile and highly farmed Upper Greensand geology. <p>Highways</p> <ul style="list-style-type: none"> • There is no footway connecting the village centre to the site and none can be created- detrimental impact on CA and overburdened infrastructure. (CDC councillor) • Construction would block the main entrance to more than 100 acres of arable land accessed by large equipment. There are two alternative access points to this land but both are on historic rural roads vulnerable to extra unsuitable traffic; the extra traffic on North Lane would be dangerous for users of the village shop. North Lane is already congested with heavy traffic (various individuals) • Neither of the alternative access points to the field are wide enough (given continuous on street parking, the narrow historic lanes they are on) for the modern agricultural vehicles which currently work on the field. (Various individuals) • Traffic levels in the village have increased dramatically since construction of the Hindhead Tunnel, this would be worsened by development of this site. | |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> Impossible to accurately predict number of vehicles on the site. Parking off site by residents is likely, causing inconvenience on surrounding streets and obstructing traffic on Elsted Road (various individuals) Adding another entrance onto Elsted Road will make it dangerous (Various individuals) Cannot leave to chance the risk of overflow parking on the street, to the detriment of the CA. <p>Affordability</p> <ul style="list-style-type: none"> The development does not propose enough affordable homes. In its current format, all it does is accumulate wealth for the landowner. Any development should be for affordable housing schemes. <p>Drainage</p> <ul style="list-style-type: none"> The road is subject to flooding due to runoff from the field, situation would be exacerbated by development (which would involve earth removal and concreting, and the creation of a 'cliff face'. (Various individuals) The proposal does not address surface water flooding risks Drainage to the nearby stream would be environmentally wrong as it is a headwater of the River Rother used for drinking water. <p>Heritage:</p> <ul style="list-style-type: none"> The allocation does not conform to the first purpose, vision or objectives of the SDNPA regarding landscape (various individuals) The site has already been rejected for planning applications by the SDNPA on grounds of impact upon Conservation area and surrounding landscape (Various individuals) The number of dwellings proposed cannot conserve and enhance the site, which currently makes a positive contribution to the Conservation Area. The effect on landscape and the CA is noted in the SA as 'uncertain' and given the density of housing, plus the need for car parking, the preservation and enhancement of the CA is unachievable, therefore unsound. | |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> • The village's historical character is agricultural; this site will close the one remaining agricultural gap in the village centre removing views to open land from the conservation area. (Various individuals) • The plan attempts to justify 5-6 properties and, because there actually is not space enough to do so within a plot depth comparable to those to west and east, the rear plot boundary has been pushed backwards by ten metres compared to the plots in the Conservation Area. This would be even more intrusive on the local landscape than would be a continuation of the historical linear development. (various individuals) • The site should not be allocated by a National Park with a landscape-led plan, given that the Sustainability Appraisal finds the effects on landscape and cultural heritage to be 'uncertain' <p>Density:</p> <ul style="list-style-type: none"> • The site has the second highest density of any proposed LP allocation, twice the density used as standard by CDC, whose experience is that such densities outside urban environments cause problems. This density is inappropriate in a rural setting. (Various individuals) • The requirement to design 'to a high standard' is unachievable given the proposed density and provision of necessary car parking on site. • The number of dwellings the site can accommodate has been exaggerated so as to meet the threshold to be an allocation (5 dwellings) <p>Dark Night Skies</p> <ul style="list-style-type: none"> • The site is adjacent to the main Dark Night Sky core zone, and would add to the light pollution visible from the village and from the Downs. <p>Biodiversity:</p> <ul style="list-style-type: none"> • The adjacent area contains much wildlife which would be put at risk by development- an ecologically sensitive damp meadow and a habitat for reptiles. (Various individuals) • The impact of extensive new impermeable footings on the ecology of the adjacent damp meadow seems not to have been considered. | |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p>Infrastructure:</p> <ul style="list-style-type: none">Concerns over impact on schools, buses and parking. <p>Alternative proposals:</p> <ul style="list-style-type: none">Propose no more than 2 dwellings, to be built at low level, parallel and adjacent to the Elsted Road, with a suitable footpath between the houses and the road. Land to the North of the proposed housing to be excavated to a lower level to facilitate appropriate access and parking for the new dwellings.Propose alternative brownfield site in Nyewood (address not specified) (Various individuals) | |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD92: Stedham Sawmill, Stedham

There were a total of 15 responses to this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>Specific consultation bodies – national agencies and utility providers</u></p> <p>Historic England: The need for a heritage statement should be in the policy not the supporting text to give it more weight.</p> <p>Natural England: Concern due to the close proximity of Iping Common SSSI which is a nationally protected heathland habitat of importance for heathland bird species including the ground nesting Nightjar. Ground nesting birds are vulnerable to disturbance from dog walking and cat predation. It is highly likely that the allocation will lead to an increase in recreational activity on the SSSI. Consideration must also given to any hydrological impacts (water quality/quantity). The SDNPA should provide evidence showing how this impact can be mitigated; however, NE are concerned that this may not be possible. NE seek evidence as to why alternative sites cannot be used and would advise against the allocation of this site.</p> <p>If alternative sites cannot be used and the allocation goes ahead then they ask that a clause is included to state that development will not be permitted unless it can demonstrate that it will not have a deleterious impact on the interest features of the adjacent SSSI.</p> <p>Southern Water: Additional local sewerage infrastructure would be required to accommodate the proposed development, allocation policy should require that the developer provides a connection at the nearest point of adequate capacity in the sewerage network</p> | <p><i>I: Should be reference to heritage statement in the policy.</i> R: It is appropriate to refer to the heritage statement in the supporting text as with all evidence studies. This is consistent with the format used across all allocation policies.</p> <p><i>I: Concern over principle of allocation due to proximity of site to Iping Common SSSI and lack of opportunities to mitigate potential recreational impacts.</i> R: Changes have been made in the submitted Schedule of Changes (Appendix 5) to address these concerns, in particular setting out appropriate mitigation measures and strengthening the policy requirement to deliver net biodiversity gains.</p> <p><i>I: Policy should require that sewer connection and capacity is dealt with.</i> R: This is a matter appropriately dealt with at the development management stage.</p> <p><i>I: Parish Council and others have objected on basis of lack of proper consultation, evidence base errors (e.g. Settlement Facilities Study), settlement form, oversupply against need, traffic and environmental impacts including on SSSI, loss of employment.</i></p> |

Policy SD93 Land South of Church Road, Steep

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <p><u>Specific consultation bodies – other local authorities</u> No comments received</p> <p><u>Parish and Town Councils</u> Stedham with Iping Parish Council made the following key points:</p> <ul style="list-style-type: none"> • They expressed concerns about the site allocation in 2016 & 17. They continue to object and seek the removal of site so it can be addressed through their NDP. There has been a lack of consultation and not at a stage at which changes can be properly made. • Evidence base errors: Settlement Facilities Assessment is incorrect in terms of public transport accessibility; site was rejected in SHLAA 2014 but is now described as PDL and offering potential for heathland regeneration; and, ELR conclusions changed from 'continue use' to 'consider alternative uses'. • Development does not relate to traditional settlement pattern for Stedham. Limited connectivity with village. Site will not integrate. • Significantly more than the 6 homes needed as identified by CDC. • Density too high; noise, traffic and access issue; trees not sufficiently buffered; Saxon shrine found near site access; impact on dark skies and vulnerable species; possible surface water flood risk on lower part of site and it adjoins public rights of way. • Loss of employment on eastern side of site, opportunity for expansion in accordance with permissions lost. Site should be identified in SD25. • Impact on Stedham Common. <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • One individual sent in the a copy of the Stedham and Iping Parish Council response (see above) | <p>R: SDNPA has met / spoken regularly with the Parish Council and sought to respond to concerns as appropriate. This includes allocation as a mixed use site rather than 100% residential site. The allocation and details of the policy are based on robust evidence and analysis of the site's opportunities and constraints (including nearby facilities and links to them). SDNPA continues to liaise with Stedham Neighbourhood Plan group as their work progresses.</p> <p><i>I: Notable Road Verge adjacent to A272 should be protected.</i> R: The land referred to sits well outside the site boundary and is in separate ownership (i.e. the local highway authority). It would not therefore be effective to include this requirement in the policy.</p> <p><i>I: No consideration of alternative sites in Stedham</i> R: The Sites and Settlements: Route map for allocations Background Paper (SS 02) sets out consideration of alternatives identified.</p> <p><i>I: Employment uses are an unattractive market prospect. The site capacity should be 40 homes to maximise contribution to OAN and affordable housing</i> R: An element of employment use ensures that Policies SD34: Sustaining the Local Economy and SD35: Employment Land are complied with, given the existing employment use. The site capacity in the Submission Local Plan (up to 16 dwellings as set out in the submitted Schedule of Changes) responds to concerns over recreational impacts on the SSSI, local representations and the Neighbourhood Plan, and to ensure an appropriately designed scheme.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> • Land south of Barlavington Way performs better against sustainability criteria and should be allocated instead (ICS Estates LTD) • NDP survey said residents wanted to protect employment land (Individual) • Not sustainable (South Downs Society) • Increase traffic, increased greenhouse gasses, limited bus service (Various individuals, South Downs Society) • Disconnected from village (South Downs Society) • The A272 verge joining the access road is designated as a Notable Road Verge for its invertebrate interest. This should be protected. (Sussex / Hampshire Wildlife Trust) • Noise generated by noise / pollution etc should not compromise homes. (The Midhurst Society) <p><u>Individuals</u></p> <ul style="list-style-type: none"> • Opposite Iping Common SSSI, within SSSI Impact Risk Zone and adjacent to deciduous woodland BAP priority habitat., in SA should be scored as likely adverse or adverse (Individual) • Loss of local businesses and jobs, not mitigated by allocation of part of site for BI. A permission has not been built, so can't guarantee existing businesses will have alternative accommodation. (Various individuals) • No potential for heathland regeneration if BI uses to be relocated onto that part of the site. (Individual) • Limited public transport • No mention of dark night skies (Individual) • Village grew around R Rother, not the A272. Separated from road by fields and woodland. Will harm setting, limited connectivity with village, damage historic landscape setting of village. (Various individuals, South Downs Society) | |

Policy SD93 Land South of Church Road, Steep

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> • CDC identify need for 6 homes, no need for private housing. (Various individuals) • Plan is site led, not landscape led (Individual) • No consideration of alternative sites in Stedham, rejected in SHLAA (South Downs Society, Individual) • Lack of consultation (Individual) <p>HMPC made the following comments on behalf of the landowners:</p> <ul style="list-style-type: none"> • Site suitable for residential development to meet OAN, employment uses have proven to be unattractive. Object to requirement for mixed used development. • Evidence contains some errors and the Local Plan has failed to take into account adequately the OAN and has applied the methodology for meeting OAN erroneously. The South Downs has the ability and capacity to accommodate further housing. • The plan will not deliver sufficient affordable housing. • The site is PDL, in a sustainable location, and deliverable. It is identified in the SHLAA as having potential for 30 and the Employment Land Review recommends reallocating the site. • Protected species are limited to those that use woodland edges. • Site has been actively marketed for employment uses. • Viability will effect quality of development. • Housing will support local school. • Suggest allocating for 40 homes which would provide affordable housing. • NDP consultation shows support for development of the site. | |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD93 Land South of Church Road, Steep

There were a total of 7 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and Response (I/R) |
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| <p><u>National agencies</u> Historic England: Historic England would prefer to see reference to Heritage Impact Assessment or Archaeological Assessment or both, with important archaeological remains or other historic features retained in situ wherever possible, or, where not possible, recorded for deposition within a public archive.</p> <p><u>Borough, City, County and District Councils</u> No comments received.</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Steep Parish Council has made the following comments: <ul style="list-style-type: none"> Incorporation of the site into the settlement boundary is welcomed, which will make possible a number of alternative futures for the village. The site has long been recognised as one of the better potential alternatives for modest development in Steep. There is also a proposal to include a parcel of land south of the village hall car park to be considered in conjunction with the allocation site. The potential of 8 to 12 units seems reasonable, however the precise number should wait completion of detailed architectural and landscaping work, and public consultation. <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Supportive of the Plan but not able to comment on the appropriateness of 8-12 dwellings since detailed surveys have not been completed. (Steep In Need Charity) | <p><i>I: Prefer to see reference to Heritage Impact Assessment or Archaeological Assessment or both.</i> R: Policy SD12: Historic Environment requires submission of a Heritage Statement with all applications proposing development that may affect a heritage asset (whether designated or non-designated). Policy SD16: Archaeology requires this statement to contain sufficient information to assess the significance of any archaeological asset and the effect on the significance of that asset.</p> <p><i>I: Include need for ecological assessment within policy</i> R: Policy SD9 and supporting text (in particular paragraph 5.72) sets out requirements for all development to conserve and enhance biodiversity, and to provide appropriate information and evidence on potential impacts to wildlife sites.</p> <p><i>I: The proposed allocation of land south of Church Road, Steep should be deleted and the land south of Barlavington Way, Midhurst should be allocated for development instead.</i> R: Midhurst is some 10 miles distant from Steep, therefore such an approach would do nothing to address local housing needs as required by the statutory duty.</p> |

Policy SD93 Land South of Church Road, Steep

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and Response (I/R) |
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| <ul style="list-style-type: none"> • Site should be reassessed to ensure that the existing biodiversity value has been properly considered. Policy should be reworded to ensure a consistent approach to assessments and net gains, with all allocations including a requirement for up-to-date ecological information and conservation and enhancement of biodiversity. (Sussex/Hampshire Wildlife Trust) • The proposed allocation of land south of Church Road, Steep should be deleted and the land south of Barlavington Way, Midhurst should be allocated for development instead. (ICS Estates Ltd.) • Allocation of site for 8-12 dwellings is entirely inappropriate and unjustified. There has been no previous public consultation. Site is currently protected as Open Space/Village Green – Saved Policy R4 of the East Hampshire Local Plan Second Review was not removed on adoption of the East Hampshire Joint Core Strategy. The Steep Parish Plan (2012) made clear the wish for this site to be for community benefit – e.g. sale of local produce, visitor centre, car parking, allotments, an orchard, village shop, village green, leaving as it is – only one reference is made in the Parish Plan to housing. (Save Our Village Green) <p><u>Individuals</u></p> <ul style="list-style-type: none"> • The site was donated in trust for the benefit of residents for growing fruit/vegetables etc. Up to 12 houses on this small site would not be in keeping with the size of houses on Church Lane. | <p><i>I: Object to allocation. Site is currently protected as Open Space/Village Green – Saved Policy R4 of the East Hampshire Local Plan Second Review. The Steep Parish Plan (2012) made clear the wish for this site to be for community benefit. 12 houses would not be in keeping with the character of Church Lane.</i></p> <p>R: The East Hampshire Local Plan Second Review was adopted in March 2006 and was intended to guide development until 31 March 2011. The Steep Parish Plan has since been produced which is positive towards a number of potential uses on this site for community benefit, including housing. It is the only suitable site identified in the village for this use, and is supported by the Parish Council. It is considered a sensitively designed housing scheme, which provides affordable housing for community benefit, is appropriate on this site.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD94 Land at Ramsdean Road, Stroud

There were a total of 7 responses to this policy. A summary of the main issues raised is set out below.

| Representations | Issue and SDNPA Response (I/R) |
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| <p><u>Specific consultation bodies – national agencies and utility providers</u></p> <p>Historic England welcomes the policies in the wider plan in relation to Heritage Impact Assessment and Archaeology Assessment but would prefer that criteria were added to each site allocation policy.</p> <p>Southern Water note that there is currently sufficient capacity in the water and sewerage networks to accommodate the development but that an easement is required which should inform the site layout.</p> <p><u>Specific consultation bodies – other local authorities</u></p> <p>Hampshire County Council supports the pedestrian and cycle access criteria and the pedestrian link to Stroud Footpath 703.</p> <p><u>Parish and Town Councils</u></p> <p>Stroud Parish Council support the allocation and raise the following comments</p> <ul style="list-style-type: none"> • Support for the ecosystem services policy • Request for early and better engagement with local communities • Query the reduction in the settlement boundary on the eastern side of the Parish <p><u>Other organisations and individuals</u></p> <ul style="list-style-type: none"> • Support for the allocation and the additional housing to support the existing settlement and rural economy (Hall and Woodhouse Ltd) • Support for the allocation but request that the policy is amended as the current description of the site is inaccurate and the ability to provide pedestrian and cycle links would be outside of the allocated site and not in control of the applicant (CALA Homes (Thames) Ltd (Craig Burden)). | <p><i>I: An easement is required which should inform the site layout.</i></p> <p>R: This is a matter that can be addressed at the planning application stage.</p> <p><i>I: Request that the policy is amended as the current description of the site is inaccurate and the ability to provide pedestrian and cycle links would be outside of the allocated site and not in control of the applicant.</i></p> <p>R: The Authority does not agree that the description of the site is inaccurate. It is agreed that the provision of cycle links does involve land outside the allocated site. However, a planning application is due to be considered by Planning Committee in August 2018 for a scheme that includes a pedestrian link from the north of the site and across the stream. A contribution to this scheme is being secured through a legal agreement. There is also a long term aspiration for people to access the adjoining primary school through the site and thus help reduce congestion along the road at school drop off and pick up times.</p> |

Policy SD94 Land at Ramsdean Road, Stroud

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and SDNPA Response (I/R) |
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| <ul style="list-style-type: none">• Objection to the inclusion of the site as the site scores poorly in the SDNPA Settlement Facilities Assessment Report and a LVIA has not been carried out. The site should be deleted and Barlavington Road, Midhurst should be included instead as a more sustainable option. | |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD95: Land South of Heather Close, West Ashling

There were a total of 4 responses to this policy. A summary of the main issues raised is set out below.

| Representations | Issue and SDNPA Response (I/R) |
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| <p><u>National agencies</u> Southern Water: Additional local sewerage infrastructure will be needed in the form of a connection to the nearest point of adequate capacity. This requirement needs to be included within the policy.</p> <p><u>Borough, City, County and District Councils</u> No comments received</p> <p><u>Parish and Town Councils</u> No comments received</p> <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Land south of Barlavington Way, Midhurst has been subject to a detailed LVIA, land south of Heather Close has not. It is also in a more sustainable community than the site at West Ashling. (ICS Estates LTD) Inconsistencies amongst the allocations in terms of biodiversity requirements. Reassess site to ensure that existing biodiversity value has been considered. Up-to-date ecological information should be required through the policy along with enhancements to biodiversity on the site. (Sussex and Hampshire Wildlife Trusts) Support (The Chichester Society) | <p><i>I: Need for additional infrastructure</i> R: The submitted Schedule of Changes (p45) proposes to add criteria to the allocation to reflect the comments of Southern Water</p> <p><i>I: Impact on biodiversity</i> R: The submitted Schedule of Changes (p45) reduces the number of dwellings to between 15 to 17 dwellings and includes an additional reference to hedgerows.</p> |

Policy SD95: Land South of Heather Close, West Ashling

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Policy SD96 Land at Long Priors, West Meon

There were a total of 15 representations on this policy. A summary of the main issues raised is set out below.

| Representations | Issue and SDNPA Response (I/R) |
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| <p><u>National agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> • Welcome parts 1(c) and 2(a) of policy which seeks to secure a publicly accessible footpath link from the development to the nearby West Meon Footpath 8. (Hampshire County Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • West Meon Parish Council has made the following comments: <ul style="list-style-type: none"> ○ Object on access grounds. Proposal will result in an increase in traffic and transport particularly along Church Road. ○ Object to extension of the built form – there will be a potentially harmful visual impact on longer views which is contrary to the Village Design Statement. ○ Attention is drawn to the protection of existing public rights of way. ○ There are historical and potential flood risks of the site. It is also susceptible to surface water. Request that measures should be put in place to ensure that development protects the integrity of Long Priors with respect to flooding. <p><u>Other organisations</u></p> | <p><i>I: Object on access grounds: increase in traffic along Church Road, no pavements, creates danger for school children, adds to parking pressures.</i> R: There are a number of residential properties that are accessed via Church Road. Whilst this is narrow in places and may suffer localised congestion in peak times, it is not considered that an additional 10-12 homes will materially change the existing situation. The allocation has a development requirement for a highways assessment, and to provide adequate parking on-site both for the needs of the new homes, and displaced parking arising from access improvements from Long Priors.</p> <p><i>I: Object to extension of the built form – there will be a potentially harmful visual impact on longer views which is contrary to the Village Design Statement. Will affect views from existing properties and public footpaths.</i> R: The site has been assessed as having medium landscape sensitivity. This is recognised in the policy, which requires a suitable transition in form and fabric from the housing to the south and west to the open countryside to the north (criteria 1(a)). The site is also viewed in the context of existing housing at Long Priors and Knapps Hard.</p> |

Policy SD96 Land at Long Priors, West Meon

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and SDNPA Response (I/R) |
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| <ul style="list-style-type: none"> Support allocation – relates well to existing settlement pattern, is sustainably located for local shops and services (in both West Meon and Petersfield & Winchester), and links to public footpath network. (Metis Homes Ltd) Site should be reassessed to ensure that the existing biodiversity value has been properly considered. Policy should be reworded to ensure a consistent approach to assessments and net gains, with all allocations including a requirement for up-to-date ecological information and conservation and enhancement of biodiversity. (Sussex/Hampshire Wildlife Trust) <p>Individuals</p> <ul style="list-style-type: none"> Object to site as it will affect access to existing garages, there is bad lighting in the area, and concern over sewerage capacity. Will affect on views from existing properties and from the public footpath. Road is already over-used, lorries are not able to turn/often blocked by emergency vehicles, limited road width, there are no pavements, dangerous for school children crossing the road, parking pressures. The school is full. Contrary to the Village Design Statement. Would lead to more dependence on the private vehicle, and vehicular emissions, for transport contrary to NPPF. There is little local employment and only a limited bus service. Site is located wholly in Groundwater Protection Zone 2 and within a groundwater Flood Alert Area (as advised by Environment Agency). The West Meon Specific Action Plan identifies flood risk for groundwater in West Meon as 'High'. Therefore allocation is not justified. There are other more appropriate sites to fill the local housing need which have less impact on the environment, landscape, child pedestrian safety and groundwater risk. There are alternative opportunities for development through windfall sites, Water resources in the area are already horrendous. Development will create extra noise. | <p>I: Site should be reassessed to ensure that the existing biodiversity value has been properly considered. R: Policy SD9 and supporting text (in particular paragraph 5.72) sets out requirements for all development to conserve and enhance biodiversity, and to provide appropriate information and evidence on potential impacts to wildlife sites.</p> <p>I: There are potential flood risks and susceptibility to surface water. Site is located wholly in Groundwater Protection Zone 2 and within a groundwater Flood Alert Area. R: Flood risk is identified as a potential constraint. A Flood Risk Assessment will be required at application stage to demonstrate appropriate mitigation in this respect as set out in paragraph 9.246.</p> <p>I: The school is full. R: Hampshire County Council has confirmed that there is sufficient school capacity to accommodate the level of housing development proposed in the SDLP. Community Infrastructure Levy funds may be available for improvements to schools and community facilities, if this proves necessary.</p> <p>I: There are other more appropriate sites to fill the local housing need which have less impact on the environment, landscape, child pedestrian safety and groundwater risk. Alternative opportunities for development through windfall sites. R: Whilst SDNPA has considered alternative sites put forward in the SHLAA, it is considered that these alternatives are not available or not suitable. Delivery of housing purely through</p> |

Policy SD96 Land at Long Priors, West Meon

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and SDNPA Response (I/R) |
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| <ul style="list-style-type: none"> • Loss of wildlife e.g. owls and bats driven away. • More light pollution will be lost due to light pollution. • Development will create hardship for people that have paid a lot of money for a quiet village life with views. Storeys Meadow should be extended instead as it impacts on fewer people. | <p>windfall does not provide sufficient certainty that housing will come forward.</p> <p><i>I: Concerns over noise, impact on wildlife (owls and bats), light pollution and noise pollution.</i></p> <p>R: There are policies in the Local Plan that ensure appropriate mitigation with respect to these possible impacts (e.g. Policy SD9: Biodiversity and Geodiversity; Policy SD8: Dark Night Skies; Policy SD7: Relative Tranquillity).</p> <p><i>I: Development will create hardship for people that have paid a lot of money for a quiet village life with views.</i></p> <p>R: This is not a valid planning consideration.</p> |

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

Omission Sites

Representations were received on 32 omission sites. The representations are summarised below.

| Representations | Issue and SDNPA Response (I/R) |
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| <p>OM Site 1: Bohunt Manor, Liphook One representation - Green Village Investments</p> <ul style="list-style-type: none"> • Potential for bypass will aid development of this site • Keen to work with Northcote Estate on a revised scheme for this site if the bypass goes ahead • Bohunt Manor presents a unique opportunity as a sustainable gateway to the park and should be allocated as a strategic site within the plan • Site is sustainably located, contributes to unmet housing need and provides the opportunity to strengthen the local economy and sustainable tourism • Liphook has a number of consented community facilities in the pipeline • SDNPA Pre-submission Plan puts undue emphasis on the natural environment at the expense of social and economic sustainability • DtC has not been met as it is unclear how neighbouring housing markets and unmet need have been addressed • The Plan is silent on Liphook and this site which provides a uniquely sustainable option for large scale housing development <p>OM Site 2: Barlavington Way, Midhurst One representation - ICS Estates Ltd (landowner/site promoter)</p> <ul style="list-style-type: none"> • The Lewes North Street Quarter site should be deleted and the Barlavington Site in Midhurst should be allocated for development as the site is in the ownership of one developer with a track record of housing delivery in Midhurst. | <p><i>Note the following responses respond to points made in relation to a number of the sites and representations summarised above. It is not proposed to respond on each site individually, given that the SDNPA has set out its evidence on the site selection process in the background papers referred to below.</i></p> <p>I: More sites are required to meet the OAN for the SDLP. R: The Plan sets out a strategy for growth across the Plan Area for the whole plan period. Sites have been chosen to reflect the settlement strategy and a medium level of growth. Core Document Library Development Strategy Background Paper (TSF 02), Sites and Settlements Background Paper (SS 01) and Sites and Settlements Route Map (SS 02) provide further information.</p> <p>I: The site should be included as an allocation, even though it was not put forward for consideration before the Pre-Submission stage of the plan process. R: The allocations within the Plan are reasonable options to meet the strategy and are not required to be assessed against alternative sites that were submitted</p> |

Omission Sites

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and SDNPA Response (I/R) |
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| <p>OM Site 3: Hoddern Farm, Peacehaven/ Land at Telscombe Road, Peacehaven One representation - EPV(East Sussex)Ltd, Mr Andrew Dutton</p> <ul style="list-style-type: none"> • Site allocation strategy should be revisited as not robust. Additional call for sites is necessary to identify most suitable locations for development. • No sites identified adjacent to Newhaven which functions as a gateway to the park. • SDNPA should consider allocating sites within the national park that are adjacent to urban areas outside the national park to make the most sustainable use of land. Site at Telscombe Road, Peacehaven is suitable, viable and available and should be allocated on that basis following an additional call for sites exercise. <p>OM Site 4: Land South of Alresford Road, Cheriton One representation - WYG for site promoter (Mr Paul Cole)</p> <ul style="list-style-type: none"> • Site was put assessed but rejected in the SHLAA in favour of Land South of the A272 in New Cheriton. The New Cheriton site is less sustainable and undeliverable. The Site at Alresford Road could deliver 6 dwellings towards the housing need and is well screened by existing boundary vegetation. <p>OM Site 5: Land under the Hill, Selbourne (Aka Barnfield) One representation - Village Green Plc</p> <ul style="list-style-type: none"> • Support the identification of Selborne for future development • Consider a revised proposal could overcome previous refusal on this site to deliver 6 units • Proposal would remove unsightly garage block, provide a new PRow and 1.5ha of open space • Site is better located, more sustainable, and meets the purposes and duties of the SDNP as opposed to Land at Ketchers Field. <p>OM Site 6: Land at Union Lane, Droxford One representation – Murray Planning Associates for Bargate Homes</p> | <p>late in the process of plan preparation. Sites not allocated for development in the Plan could still come forward for development, subject to complying with other Local Plan policies, or be considered through future iterations of the SHLAA. The Consultation Statement (SDLP 03) sets out how sites were consulted on.</p> <p>I: The SHLAA process was inconsistent and sites have not been adequately considered. R: The SHLAA process formed an element of the site assessments but sites considered within the SHLAA are not necessarily suitable for development. The SHLAA is available in the Core Document Library (TSF 10 and Appendices).</p> <p>I: The Plan does not adequately consider the impact on the landscape and the omission site put forward is more suitable in landscape terms. R: The site allocations were selected on balance after considering all the evidence available including the landscape assessment to inform the strategy for growth. The Sites and Settlements documents in the Core Document Library (SS01 to SS08) are informed by the landscape assessments (TLL 01 to TLL 24). The Landscape Background Paper (TLL 01) sets out how landscape considerations have informed the preparation of the Local Plan.</p> |

Omission Sites

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and SDNPA Response (I/R) |
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| <ul style="list-style-type: none"> • Support for the overall strategy in the Plan. Representation is made in relation to the site at Park Lane being allocated in preference to the site at Union Lane. • The SHLAA is flawed in its scoring of Union Lane and Bargate Homes believes that the Park Land site is more detrimental in terms of landscape as it would require significant road widening which would remove trees that are essential for screening. <p>OM Site 7: Longmoor Depot, Greatham Main representation from GVA on behalf of the Whitehill and Bordon Regeneration Company</p> <ul style="list-style-type: none"> • Promote Longmoor Depot for B1/B2/B8 employment uses. • The site area is 8.4 ha of which 7.4 ha is brownfield and becomes available in 2019. It could accommodate approximately 10 buildings with a floorspace of up to 9,450 m². <p>Supporting representation from the EHDC Cabinet Portfolio Holder for Whitehill and Bordon.</p> <p>OM Site 8: Land at North of Hill Brow Lane, Liss One representation - Boyer Planning for Wates</p> <ul style="list-style-type: none"> • Site allocation process is not robust, does not meet the requirements of the NPPF and the plan fails in the DtC in relation to OAN • Site proposed would provide additional housing in a sustainable location contrary to the assessments for the SDNPA Local Plan and the Liss NDP. <p>OM Site 9: Kiln Lane, Buriton Two representations – WYG, Buriton Parish Council</p> <ul style="list-style-type: none"> • Two sites within a single field are promoted. One of the sites was a draft allocation at Preferred Options. No clear reason for this site to not be considered in the Plan as it provides a more sustainable option than other sites and would contribute to meeting the OAN. (WYG) | |

Omission Sites

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and SDNPA Response (I/R) |
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| <ul style="list-style-type: none"> Against the allocation in principle but request number of amendments if allocation goes ahead. Submitted reps at earlier stage - concerns about localised flooding, traffic and wildlife (Barn Owls). Request for high design quality and sympathetic placement in the landscape (Buriton PC) <p>OM Site 10: Burlands Field / Culverscroft, Selborne One representation – Newton Valance Farm</p> <ul style="list-style-type: none"> Site could be developed in conjunction with land to the rear of Goslings Croft for 8-12 affordable housing units and still maintain a large proportion of greenspace. The site is more suitable and sustainable than others put forward (including Ketchers Field) and is adjacent to existing development. <p>OM Site 11: Land at Crossbush One representation - Angmering Estate/Savills</p> <ul style="list-style-type: none"> Site appraisals within the SHLAA is generic and not robust. The Arundel bypass will provide new opportunities for housing sites and so the Angmering Estate submits Land at Crossbush for allocation to provide additional housing supply to meet the currently unmet OAN. <p>OM Site 12: Land at Sweetland Steyning One representation - CALA Homes Ltd</p> <ul style="list-style-type: none"> Object to omission of the site from allocations as the site broadly met the requirements of all the criteria in the SHLAA scoring poorly only as a greenfield site which does not meet the objectives of the SDNP. Site is adjacent to the Steyning built up location and therefore in a sustainable location Although within a Neighbourhood Plan Area the site should be revisited for inclusion in the Plan. Discussions with the neighbourhood plan group have been positive and the site could enhance the setting of Steyning within the SDNP. | |

Omission Sites

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and SDNPA Response (I/R) |
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| <p>OM Site 13: Land at Dodds Lane One representation - Consentium (alternative site name – Cobbett Close, Swanmore)</p> <ul style="list-style-type: none"> Disagree with SDNPA landscape assessment – further assessment submitted. Site would contribute to OAN for SDNP in a sustainable location and should be considered as part of a wider site allocations assessment. The smaller site being proposed at this time scores positively using the SDNPA's own criteria and the indicative layout demonstrates the potential for this site <p>OM Site 14: Intensification of SCU Leydene East Meon One representation - Deansmoor Properties Ltd</p> <ul style="list-style-type: none"> Put forward the site for 24 dwellings to replace the current 14 dwellings SDNPA has not fully tested the housing market area, OAN figures and the Duty to Cooperate has not agreed how the shortfalls will be delivered in the wider area <p>OM Site 15: Land at Eight Bells Public House Jevington One representation - DMH Stallard on behalf of Richard Green</p> <ul style="list-style-type: none"> This is a small, sustainably located infill site that should be allocated for 3 to 5 houses <p>OM Site 16: Lodge Hill Activity Centre Coldwaltham One representation - Henry Adams (Chris Locke) for the Activity Centre</p> <ul style="list-style-type: none"> Proposed alternative site to SD64. This site is larger, available and deliverable with no adverse impact on the SDNPA. Believe the PC is supportive of this site. Residential development will support the ongoing activities of the activity centre and much needed housing for the community <p>OM Site 17: Lewes Racecourse Lewes One representation - Individual</p> <ul style="list-style-type: none"> Concerned about lack of opportunity for community and parish council to comment. SDNP should provide more protection to all sites. Development should | |

Omission Sites

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and SDNPA Response (I/R) |
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| <p>be maintained within the existing built up boundary. The racecourse is an environmental asset and community resource as well as a designated battlefield.</p> <p>OM Site 18: Coldwaltham Land West of Kings Lane One representation – Individual</p> <ul style="list-style-type: none"> • ‘Site 2’ as proposed by the developers is not more sustainable than ‘Site 1’ and the information provided in support of the sites is inaccurate. The allocation SD64 is preferable in terms of sustainable development and meeting the purposed and duties of the SDNPA. <p>OM Site 19: Land South of Wellgreen Lane, Kingston nr Lewes One representation – Strutt and Parker for the landowner</p> <ul style="list-style-type: none"> • Site at Wellgreen Lane was positively received at earlier stages by the policy team and it is unclear why the site the Plan favours the Castelmere site instead • Wellgreen Lane site can deliver more housing, affordable housing, safer highway access and better positioning within the landscape, within the timeframe required in the Plan • The Parish Council and local community have not had adequate opportunity to comment on the proposals for Kingston <p>OM Site 20: Land at Homes of Rest, The Street, Graffham One representation - Reside Developments Ltd</p> <ul style="list-style-type: none"> • Plan is not positively prepared as it does not include those sites with planning permission. Sites with planning permission including Land at Homes of Rest, The Street, Graffham should be allocated. • The plan does not meet the requirements of the NPPF (particularly paras 151, 152 and 157), should allocate sites with existing planning permission particularly where those sites would help meet the OAN. • Land at Homes of Rest should be allocated for five dwellings | |

Omission Sites

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and SDNPA Response (I/R) |
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| <p>OM Site 21: Land at Beechwood Lane Cooksbridge One representation - Rydon Homes</p> <ul style="list-style-type: none"> This site should be allocated within the plan for a total of 23 units. Supporting information has been submitted in support of the allocation and the site has been subject to pre-application discussion with Lewes District Council <p>OM Site 22: 84a and 86 Petersfield Road One representation – individual</p> <ul style="list-style-type: none"> Although not available at present, the sites are now likely to be available for redevelopment before the end of the Plan period and should be included as site allocations <p>OM Site 23: Warren Barn, Priors Dean One representation – individual</p> <ul style="list-style-type: none"> This site should be allocated for Travelling Show People as the Plan does not address this need in East Hampshire (see also comments relating to SD33) <p>OM Site 24: Land at Steepdown Road Sompting One representation - Thakeham</p> <ul style="list-style-type: none"> SDNPA has not met the duty to cooperate in relation to housing delivery and therefor Thakeham wish to propose the site at Steepdown Road, Sompting in order to meet the OAN. The DtC should be met prior to submission of the Plan. Thakeham do not believe that all housing sites should be required to meet criteria I(b) of Policy SD 27. <p>OM Site 25: Various small sites, East Dean One representation – Gilbert Estate</p> <ul style="list-style-type: none"> The SHLAA is incorrect in its consideration of these sites. The Wealden SHLAA considered the sites more positively. The reinstatement of the settlement | |

Omission Sites

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and SDNPA Response (I/R) |
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| <p>boundary implies that East Dean can provide further development within that boundary.</p> <ul style="list-style-type: none"> The NPPF requires authorities to consider how constraints can be overcome and the Plan fails to do this in regards to these housing sites (WE001, WE002, WE003). <p>OM Site 26: West of Nepcote, Findon One representation - Strutt and Parker on behalf of the landowner</p> <ul style="list-style-type: none"> The Plan notes that housing figures for each settlement are approximate and subject to revision with land availability The site is adjacent to, and a logical extension of, Findon village. It is within a Local Gap site that was struck out by the Examiner of the Findon NDP as it would constrain the supply of housing The site is well located without significant constraints and could accommodate 15-20 the provision of a comprehensive landscaping scheme <p>OM Site 27: Three Cornered Piece, Harting One representation – Heine Planning (additional comments on other G&T sites)</p> <ul style="list-style-type: none"> The Plan does not properly account for the need of Gypsies, Travellers or Travelling Show People. This Plan should take account of the current application and the site should be allocated to meet the need of the landowners who have been unable to find a site for 7 years. <p>OM Site 28: Northfields Farm and adjacent land, Twyford One representation - Twyford Parish Council 895</p> <ul style="list-style-type: none"> Site is included within the Twyford Neighbourhood Plan but requires the support of an allocation within the Local Plan. The site has a long history of different uses and has lacked a coordinated approach from the relevant planning authorities. The site should be allocated to allow for proper planning control. | |

Omission Sites

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and SDNPA Response (I/R) |
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| <p>OM Site 29: Various site on West Dean Estate One representation – Savills on behalf of The Edward James Foundation</p> <ul style="list-style-type: none"> • Support for the work the SDNPA has done to pull together a plan across such a complex geographical area • It is unclear how the landscape assessment has been undertaken for the whole plan and the assessment made for each site • The sites at West Dean put forward for the SHLAA should be included to provide for the unmet housing need and have formed part of the discussions with the SDNPA on the draft Whole Estate Plan. <p>OM Site 30: Various sites on Glynde Estate (around St Mary’s Church and Wharf) and site near Tarring Nevill One representation - Lewes District Green Party (Cllr Joanna Carter)</p> <ul style="list-style-type: none"> • Potential for development of affordable homes in Glynde at disused buildings and land to the south of St Mary’s Church, Glynde, and disused buildings and land at the Wharf, Glynde. • Potential development of a Village Hall replacing buildings between the Recreation Ground and The Wharf Car Park, The Street Glynde • Development of affordable housing and related public transport infrastructure at Chalk Pit on A26 between Tarring Nevill and South Highton <p>OM Site 31: Land to east of London Road, Coldwaltham One representation - Batchelor Monkhouse for Cooper and Spofforth</p> <ul style="list-style-type: none"> • The site is well located and available for delivery. Although not submitted as part of the SHLAA, it is in a sustainable location and could deliver at least 10 units with 50% affordable housing. There is good access to the village and the impact on the landscape would be minimal. The SDNPA are not planning for the full housing need in Coldwaltham and this site would contribute to the OAN. | |

Omission Sites

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues and Responses

| Representations | Issue and SDNPA Response (I/R) |
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| <p>OM Site 32: Land to west of London Road, Coldwaltham</p> <p>One representation - Batchelor Monkhouse for Cooper and Spofforth</p> <ul style="list-style-type: none">The site is well located and available for delivery. Although not submitted as part of the SHLAA, it is in a sustainable location and could deliver at least 25 units with 50% affordable housing. There is good access to the village and the impact on the landscape would be minimal. The SDNPA are not planning for the full housing need in Coldwaltham and this site would contribute to the OAN. | |

Omission Sites