



1. Introduction

- 1.1. Troy Planning + Design (Troy Hayes Planning Limited) is instructed by the landowners at Pulens Lane, Sheet to submit a Position Statement (PS) in response to the Legal and Strategic Matters, under the Week 1 Hearing as part of the South Downs Local Plan Examination in Public (EiP).
- 1.2. References made within this document to 'the site' or 'Land at Pulens Lane' relate to the site as outlined in Allocation Policy SD89 of the Pre-submission version of the South Downs Local Plan¹ and the land within the redline plan on Page 331 of the same Local Plan document.
- 1.3. Our PS provides an updated review of the Local Plan in the context of relevant changes proposed by the South Downs National Park Authority under Main Modifications², Minor Edits³, Consultation Responses⁴ and the final Schedule of Changes⁵.
- 1.4. In light of our representations to the Local Plan, this submission comprises a review solely of Strategic Matters to be considered under Week 1 of the EiP. The PS considers Matters 2 (Strategy) and 4 (Overall housing need and supply). Further comments in relation to Non-Strategic matters will be submitted as a separate PS in due course.
- 1.5. The contents of the PS do not prejudice any future representation or future negotiation with the South Downs National Park Authority (SDNPA) or any other interested party at the EiP Hearings.

2. Previous representations

- 2.1. Troy Planning + Design previously submitted representations on behalf of the landowners of Pulens Lane, dated 21 November 2017, as part of the Regulation 19 Pre-submission

¹Submission Document Reference **SDLP 01**

² **SDNPA.3** - Main Modifications August 2018

³ **SDNPA.3A** - Minor Edits August 2018

⁴ **SDNPA.4** - Responses by policy and site: Revised Appendix 4 of the Submission Consultation Statement

⁵ Submission Document Reference **SDLP 01.1**

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Local Plan, with particular regard to the soundness of Strategic Policies SD25, SD26, SD27 and SD45, and Site Allocations Policy SD89.

- 2.2. Our representations highlighted concerns regarding the soundness of the Strategic Policies. In relation to Strategic Policy SD25 (Development Strategy) our previous comments were as follows:

In relation to Strategic Policy SD25 the drawing of the settlement boundary on the Proposed Policy Map, excluding part of the site considered for allocation by Allocation Policy SD89, is considered to fail to respond sensitively to the site or offer any advantage beyond the defined requirements of Allocation Policy SD89. It is unclear how the position of the settlement boundary has been determined with no apparent connection with the settlement boundary methodology. It is therefore suggested that the settlement boundary is redrawn to facilitate the preparation of the Design Brief and a more in-depth design process which can account for site-specific constraints, such as ecology, to occur.

- 2.3. In relation to policies SD25 and SD26 the following comments were given:

The approach outlined in Strategic Policy SD25 and SD26 in relation to the site is broadly welcomed. In the absence of a neighbourhood plan for the parish of Sheet and little demonstrable prospect for windfall opportunities within Sheet the allocation of Land at Pulens Lane in line with Allocations Policy SD89 presents an important opportunity to provide high quality new homes in an accessible and sustainable location.

- 2.4. Further reference was made to the site's ease of access to local facilities and amenities, with nearby schools, nurseries, shops, sports fields and a leisure centre, all accessible by car, foot, bicycle or bus.

3. Position with regard to the Submitted Plan for Examination

Matter 2 – Strategy

- 3.1. Our clients remain, in principle, supportive of the Pre-submission Local Plan however they maintain concerns regarding the detail as stated in our previous response to the Regulation 19 Local Plan.

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- 3.2. The proposed settlement boundary, as indicated on the Policies Map for Sheet, remains unchanged from the Settlement Boundary Review: 2017 Update Background Paper⁶, which informed the settlement boundary changes for the Local Plan. This outlines an extension to the Sheet settlement boundary (reference 58) and our clients remain concerned that the boundary does not include the entirety of the proposed allocation SD89.
- 3.3. The effect of the proposed settlement boundary would unduly restrict development option testing through the masterplanning process. In addition, the drawing of the settlement boundary on this location fails to respond sensitively to the site and it remains unclear how the placing of this line was determined, as it appears arbitrary.
- 3.4. Furthermore, there is still no apparent connection between the settlement boundary methodology, the requirements of Allocation Policy SD89 and known on-site constraints, including ecology. It is therefore recommended that the settlement boundary is redrawn to include the entire site to facilitate a more in-depth masterplanning process to occur, without unnecessarily constraining development or innovative solutions for the promotion of environmental, social and economic sustainability.
- 3.5. Our clients consider that there are sufficient controls in place elsewhere in the plan to ensure that the requirements of SD89 and the wider Local Plan are delivered, despite the Settlement Boundary Review: 2017 Update Background Paper justifying that the settlement boundary is drawn to reflect the part of the site proposed as the 'built-up' area. Alternatively, support would also be given to an approach where a settlement boundary review is undertaken once development has taken place, aligned with the next review of the Local Plan. Overall, our clients consider that the settlement boundary should be revised to take account of the potential developable area.

Matter 4 – Overall Housing Need and Supply

- 3.6. In relation to Strategic Policy SD26 (Supply of Homes), our clients continue to welcome the Authority's in principle support for the delivery of development in Sheet, in order to meet a local need for housing.

⁶ Submission Document Reference **TSF 05**

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3.7. Policy SD26 sets out a housing requirement figure of up to 31 new dwellings within Sheet.

We consider this figure to be correct and deliverable well within the plan period through our clients' site.

3.8. Our clients are supportive of the Draft Development Brief for Land at Pulens Lane Sheet⁷, dated March 2018, which supports the provision of between 30-32 new dwellings at the site. The Sustainability Appraisal carried out by AECOM⁸ in April 2018 has assessed the site's development capacity on the basis of the suggested figure of 31 dwellings, noting that the site allocation would not be categorised as presenting any likely significant effects. The report noted that '*Sheet is a sustainably located village within walking distance of Petersfield town centre, therefore this is considered in line with a medium growth dispersed strategy.*'

3.9. The Inspector may be aware that there is a revised Development Brief for the Pulens Lane site recently approved by Planning Committee at their meeting, held on 13 September 2018. The recently approved Development Brief, which serves to act as a guide for developers, sets a revised housing capacity for the site of suggested as 15 to 18 dwellings. We note that the amended Development Brief does not form part of the Core Documents Library. Further representations will be provided in relation to Site Allocations Policy SD89 in due course, as part of this examination.

4. Conclusions

4.1. Our clients remain supportive in principle of the South Downs Local Plan in relation to its housing requirement for Sheet (31 dwellings) which is deliverable through the Pulens Lane site allocation.

⁷ Submission Document Reference **SS 08**

⁸ Submission Document Reference **SDLP 04**