

Position Statement on behalf of The Goodwood Estate Company Limited

MATTER 2 : Strategy
Policy SD25

It is the position of the Goodwood Estate that the response of the local planning authority to concerns raised in representations to the local plan is unacceptable. Neither the proposed modifications nor the reasoning offered through the Summary of Issues and responses offers the Estate with any comfort or certainty that the concerns raised have been considered and adjusted appropriately.

The concerns raised in the representation relating to the soundness of the authority's development strategy within the national park remain. The objectives of restriction and protection are easily stated but the local plan lacks any detail strategic response to how it will deliver such aims.

The broad-brush approach to policy application is acceptable at a strategic level if supported by local, detail policy. The latter is absent and for this reason the plan lacks clarity, precision and balance and consequently it provides uncertainty to developers, landowners, businesses and communities with the National Park.

Matter 2 :

Is the Development Strategy for the SDNP and its Town and Village Centres, put forward by Policy SD25 of the Plan, appropriate and justified by robust evidence, with respect in particular to:

- a. the choice which has been made between alternative approaches to development distribution,
- b. the functional relationships between communities inside and outside the SDNP boundary,
- c. the identified settlements,
- d. the identified town centres,
- e. the redevelopment of previously developed land outside settlements?

The Estate controls very little land within identified settlements or identified town centres. However, it is very concerned that potential developments on the edge of the National Park (in part fuelled by unduly restrictive development policies within the park) can be as damaging to national park objectives as developments proposed within the designated area.

The Estate wishes there to be greater cooperation between the National Park authority and those authorities with a common boundary, to ensure there is an appropriate and defensive buffer between new development and the National Park boundary. It is accepted that it is difficult to justify a particular width of "buffer" that is appropriate but a general policy of keeping open landscape within half to one mile of the boundary to be used for primarily countryside activities would be a workable policy approach.

It is accepted that the authority's jurisdiction ends at its boundary, but Government advice encourages appropriate cross-border cooperation to avoid anomalies in the planning system and decision making. Discussion with neighbouring authorities over housing supply through the duty to co-operate has undoubtedly taken place, even if we are concerned at its effectiveness. However, there is no evidence to suggest that other considerations essential to the integrity of the local plan and national park, such as maintaining the integrity of Park boundaries, have similarly been undertaken.

The approach of directing new development to established centres (particularly to those better serviced outside the park) is a well-established principle and the Estate does not object to this concept.

Within the park however, the approach should be more specific with an identification of true need and consequential provision, where this can be achieved without harm to park objectives. The Estate has made it known that there are many smaller development site opportunities within its land ownership that could be brought forward to meet genuine local need. The estate is working with Parishes where there is a very real need for local housing but which is precluded by existing and emerging policy. There may be opportunity through neighbourhood plans to provide such sites (although this is not explicitly encouraged by the local plan) but many Parishes do not have the resources to prepare sound plans. It is inappropriate for the authority to simply push such responsibility¹, detailed site considerations and local development needs to Parishes when there is clear evidence that such plans are unlikely to

¹ Page 110 Summary of Issues and Responses (second issue)

be prepared. The local plan therefore fails to properly plan for its area. Cynically one might suggest that the 'broad-brush approach' to development delivery, linked to local provision through neighbourhood plans, will result in an inappropriately tilted planning balance and even more restrictive planning framework (albeit with local political support).

The broad-brush policy approach adopted² should be a first stage strategic approach to national park planning policy, supported by second stage policy that drills down to a greater level of detail. This can be undertaken through neighbourhood plans, but where such a plan is absent the local plan should step in with detailed policy and proposals. Failing to do this applies a 'one-size fits all' approach that is incompatible with the pursuit of National Park objectives which are often and collectively dependent upon site-specific decisions.

Consequently, a broad-brush policy approach applied to define larger settlements where development should be concentrated, leaves the Estate in a position that any development must be promoted as an exception to policy with much justification and no certainty. This is contrary to the presumption in favour of sustainable development (a requirement that is not precluded but controlled within National Parks). It means that many smaller settlements and rural areas will not be allowed much needed and worthwhile sustainable developments - the restriction on development will always be applied where no site-specific policy exists. Experience shows that proposals considered on individual planning merit as exception sites will, in almost all circumstances be met with the in-principle resistance of non-conformity.

Suitability of agricultural or forestry buildings for conversion

Paragraph 7.208³ is too inflexible – proposals must be treated on individual merit. There are locations where change to existing buildings, rebuilding or extension may be appropriate, particularly where the planning balance will generate housing, social or economic benefits to the national park without harm to objectives, or enable enhancements to be made to landscape or heritage assets. Policy SD25 in so far as it relates to new-build development should be equally flexible where equal positive merit can be demonstrated. It should be made clear through the plan that policies and principles are to be applied generally and it is possible to deviate with sound reasoning. The authority's approach to date is that of policies applied as strict rules to be enforced, without due consideration to individual merit or circumstance.

Whole Estate Plans

The plan should promote the evolution of landed estates as major businesses within the park that generate funds for reinvesting in the National Park's sustainability. While such businesses comprise employment and commercial activities they are also key providers and managers of housing, much of it small, traditional, or of heritage merit. Housing that is much valued in a variety of ways within the national park.

Estates should be permitted to continue the tradition of housing provision in relation to estate generated need, to allow the relocation of tenants as required (downsizing through the provision of new accommodation) and to provide new housing (to meet OAN and to provide enabling development to reinvest in business that will benefit the national park overall). Policies should contain sufficient flexibility to enable estates to plan and undertake appropriate developments with confidence, and recognise that a divergence from policy may be acceptable in certain circumstance.

The intent of Policy SD25 (3) is supported in this respect but the planning role of Whole Estate Plans should consequently be given weight through the local plan and should unequivocally form part of the development plan.

The authority's insistence these are kept outside of the development plan but endorsed by the authority, generates a two-tier planning policy and with it, uncertainty. Estate plans are increasingly being used to determine the appropriateness of development proposals and given weight in planning decisions but this is not set out formally in local plan policy. Policy SD25(3) infers the role and weight of Whole Estate Plans but this is easily set aside through the application of other policies and objectives.

² Page 14 Summary of Issues and Responses (second issue)

³ Schedule of Main Mods MM14-MM16