



PRE-SUBMISSION SOUTH DOWNS LOCAL PLAN Position statement on behalf of Newton Valence Farm (R224) Matter 10 - 11 Chapter 7 policy SD88 Selborne

1. Representations have been submitted regarding the proposed housing requirement of the Pre-submission plan. This representation concerns a specific site within policy SD26 and the subject of detailed policy SD88.
2. The proposed allocation of the Ketchers Field site at Selborne is unsound and flawed because there is 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. Neither have the access drawbacks and conflict between vehicles and pedestrians been properly considered.
3. The site has been used (and may still be) to accommodate seasonal workers employed on the Blackmoor Estate. In the past it has been proposed by the owners that the site could be developed if agreement can be reached on providing an alternative location for the seasonal employees' accommodation and other development at the hamlet of Blackmoor.
4. Since the site was first proposed nothing has happened. For example there has been no pre-application advice request about this site logged on the SDNP planning application system.
5. Allocation policy SD25 and detailed policy SD88 blithely assume that the site meets all the tests to be deliverable (National Planning Policy Framework para 47 and footnotes 11 and 12). It simply is not known if the site is:
 - Available now
 - Be achievable within 5 years (so far nothing has happened in the 5 years that have elapsed since it was first suggested as a potential development site).
 - Viable given past indications that the release of the site was dependent on other planning proposals.

There simply is no evidence that this is the case.

6. The SDNPA response to the representations (which is set out in paragraph 13 below) misrepresents and/ or misunderstands the issue of highways. The point raised by the representor was that the Highways Assessment Report of this site (HCC Site Allocations Assessment March 2017 Core Document SS 04) explained the deficiencies of the existing track to the site in terms of its width and south facing visibility splays and the need to remove trees that make a major contribution to the visual quality of the locality and the proposed local greenspace designation (Selborne Recreation Ground). Set out below is the relevant part of CD SS 04 for the site.

The site is located behind the Ketchers Field residential development, and is accessed via a narrow concrete track off the B3006 south of Selborne village. The track is generally 3m wide and provides access to three properties as well as the car park for the village recreation ground. The section of the B3006 between the junction with the track and Ketchers Field is subject to a 30mph speed limit, although further north towards the village centre there is a section of traffic calming where the speed limit has been reduced to 20mph. The verge to the north of the track junction is over 8m and provides a good sightline to approaching traffic, and although the verge to the south is narrower sightlines in excess of 50m can be achieved.

Existing Access

There is little scope to widen the concrete track between the B3006 junction and the entrance to the recreation ground as the track is bounded either side by private land. Beyond the recreation ground the track is constricted by a line of mature trees currently screening the recreation ground from New Cottage and numbers 11 to 15 Ketchers Field. The track is only 2.6m wide between the frontage of New Cottage and the verge containing the trees, and to widen this section to provide a minimal 5m wide access would require the removal of these trees. This may result in objections from local residents on environmental grounds and loss of amenity.

Proposed Access

An alternative option would be to provide an access across the existing car park behind the Ketchers Field estate between numbers 19 & 20. This has the advantage of utilising the existing estate road network and existing junction on to the main road. This option may result in lose of 3 existing parking bays in Ketchers Field, but could be mitigated by providing additional spaces in any proposed development. However, the proposed development may result in objections from the existing residents over the additional traffic through their estate.

7. The issues raised in CD SS 04 are not trifling. First, the full length of the access track to the potential allocation site is a public footpath where walkers have to share the route with vehicular traffic. Second, the track provides access on foot to a well-used recreation ground and allotments. No consideration was given by HCC to the conflict between pedestrians

and vehicles. The traffic from the proposed allocation site would exacerbate that conflict.

8. Third, the owner of the proposed allocation site has no control over the first 95m of the access road leading from the B3006 and thus has no ability to improve that route. The present access - see photograph below - is insufficient in width to allow vehicles to enter and leave at the same time which would mean a vehicle needing to leave the B3006 would have to stop in the carriageway to allow another vehicle to leave. Such a situation creates a danger to highway users to add to the danger to pedestrians already identified.



9. Fourth, the access serves a well-used recreation ground, the village allotments, at least three dwellings and the Pavilion Pre-School that has places for 24 children. The Pre-School has been in existence since 2007 and operates during term time only, on Monday and Friday mornings from 9am to 12.30pm and on Tuesdays and Thursdays until 3pm. Parents and children have to use the access route to reach the Pre-School. No consideration has been given to creating a safe walking route for adults and children along the access. No meaningful assessment has been made of the use of the access track by pedestrians.
10. Fifth, as the proposer has no ownership of the first part of the access it cannot be said that the proposed allocation site is available for development because the issue of highway safety and the capacity to improve the track has not been satisfactorily demonstrated. How would the access be brought up to an acceptable standard with an adequate junction, width and pedestrian pavement. How would that be achieved is adjacent landowners are not prepared to agree the removal of boundary hedges or even the partial demolition of buildings at Ketchers Farm?

11. As a result the inclusion of the following text in proposed policy SD88 that:

c) Vehicular access compatible with non-vehicular users of, and not harmful to the amenity of, the existing Public Right of Way

is gratuitous wishful thinking and totally unsupported by any analysis of current use or what would be required to provide a safe access for all users. The problem that would repeatedly occur is ably demonstrated by the aerial photograph below where a car is using the track.



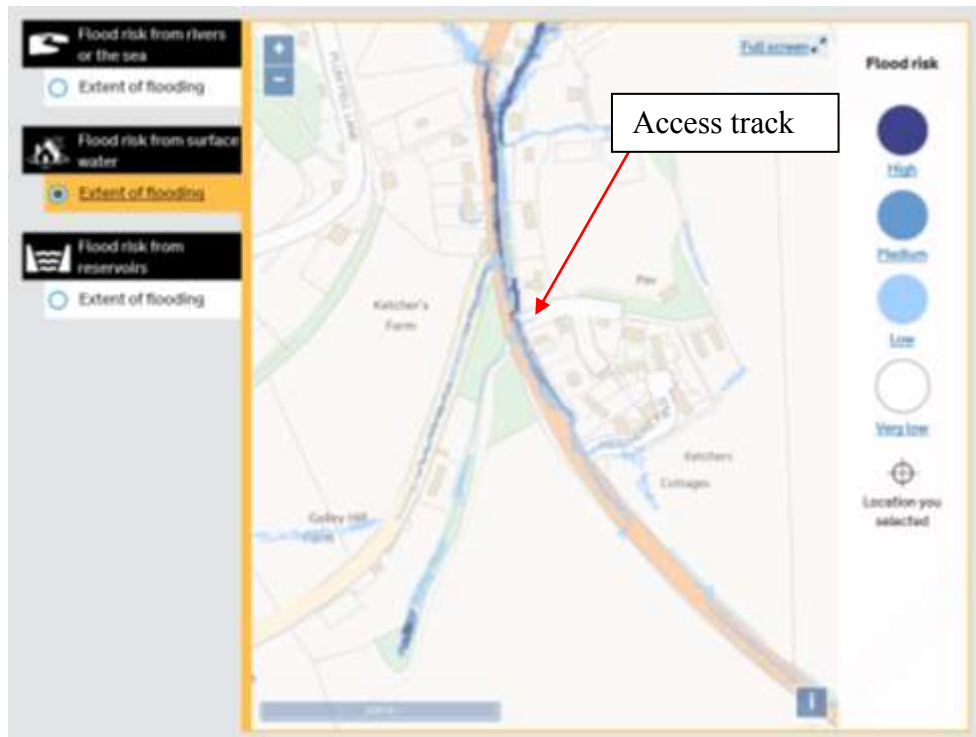
12. Sixth, the poor condition of the access track - it is two strips of concrete with grass in the middle and either side - is totally unsuitable to serve as a vehicular access to the proposed allocation site. As a result the access deficiencies point to the fact that the development of the site is simply not achievable in the context of the Framework.

13. The SDNPA's response to the representations that "*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*" remains ill-considered wishful thinking and ducked answering the representation.

14. Seventh, The potential impact on trees and hedgerows belonging to others has been blithely assumed to be acceptable. That assumption belies the self-proclaimed 'landscape led approach' to development of the SDNPA. How is an access road going to be created under the canopy of substantial trees on the boundary of the recreation ground - see photograph at the top of the next page. Indeed it begs the question whether it would be possible or conceivable to provide such an access with the blessing of the authority's Arboricultural officer.



- 15 The implications for trees and the potential for their demise through necessary and essential roadworks are significant local landscape considerations in so far as the views from the recreation ground are concerned and the visual amenity of users of the public footpath are concerned. The fact that the recreation ground is proposed as a Local Greenspace (SDNPLP policy SD47) weighs against the proposed allocation not for it. If the designation of the recreation ground as a Local Greenspace is to have any credibility it should be a factor to tell against the proposed allocation on the grounds that it is of particular local importance for the community that should not be diminished by development that would undermine that importance.
- 16 Eight, neither the promoter of the site nor the planning authority has given consideration to the surface water flooding that regularly occurs on the B3006 across the access to the recreation ground. This is shown on the Environment Agency surface water flood map on the next page. This factor needs to a solution and should not have been overlooked.

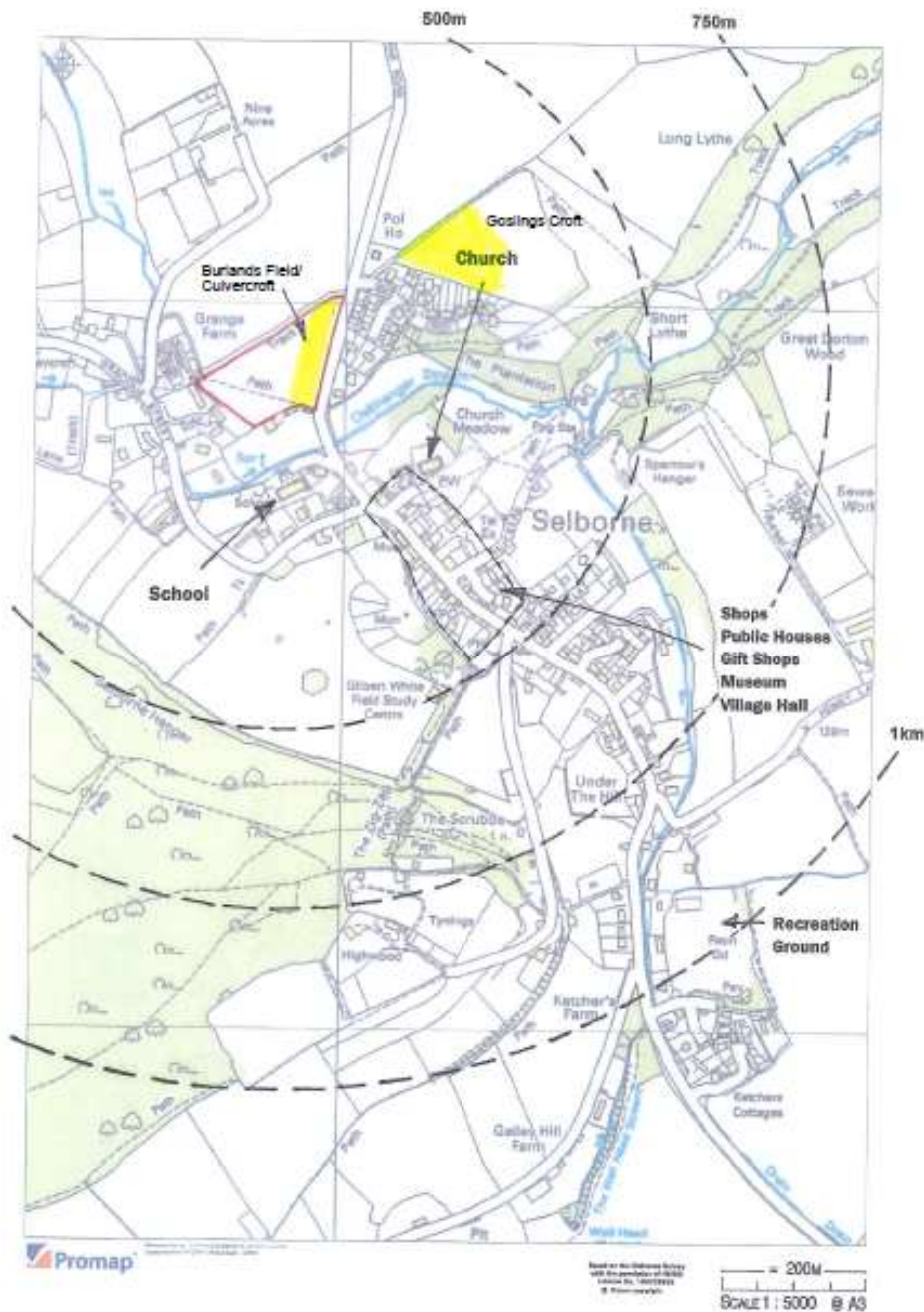


- 17 The final principal planning issue concerns the fact that this proposed allocation site is remote from village services (apart from the recreation ground and Pre-School) and young children attending the village school will have to use narrow pavements and be in danger from traffic passing through the village. The plan on the next page shows the location of the site in relation to village facilities. The site at Ketchers would be 870m from the village shop and 1.2kms from the village school. Those are not convenient walking distances and most especially when pavements are narrow and traffic is also constrained by the narrowness of the roadway. The site is thus not in a sustainable location where village facilities can be conveniently and comfortably reached on foot.
- 18 The community at large and the Highways Authority recognize that the traffic conditions in the village are dangerous and there have been a number of measures taken to reduce the speed of traffic through the village over the years. Currently a 20 mph speed limit applies in the village centre. None of those initiatives have addressed the narrow and inadequate pedestrian pavements. The result is that pedestrians coming from the southern end of the village are at risk from passing traffic as the pavements are too narrow. The same also applies to cyclists on the narrow carriageway. It simply would, fundamentally, be 'bad planning' to put pedestrians and cyclists at risk by locating a development site at Ketchers Field.



- 19 The proposed site allocation should be withdrawn because of serious questions about its deliverability and an alternative site found that in combination with a site available for sustainable affordable housing would better meet the National Park duty to foster the social well-being of the community of Selborne.

- 20 There is another site in Selborne that is available and deliverable for housing at Burlands Field/ Culvercroft at the north end of the village. Close by that is a further site at Goslings Croft that could be developed for affordable housing. - the plan on the next page shows the two sites. Currently the whole of Burlands Field is proposed as a local greenspace (against which representations have been made) part of that site could be made available as a proposed housing site and the bulk of the land remain undeveloped and be a potential local greenspace.



21 The site at Burlands Field/ Culvercroft could easily accommodate six new dwellings and could be developed in conjunction with the nearby site across the Alton Road at the rear of Goslings Croft for 8 -12 affordable housing units. The combination of the two sites would be a more realistic development for a village the size of Selborne and make a significant contribution to the duty of the NP to seek to foster the social and economic wellbeing of this community within the National Park. Despite the Village Community Plan being adopted as SPG in 2013 nothing has ever emerged as a result of the community's preference for any development to be within the settlement policy boundary. There simply is no room to cram any development within the settlement policy boundary.

22 In a proposed planning policy climate of the SDNPA not meeting its OAN for housing it is vitally important that 'no stone is left unturned' in maximizing those very modest developments that cumulatively could reduce the housing deficit being planned for. The site at Ketchers Field fails all reasonable tests of availability and suitability for development and a more enlightened approach at Selborne that could deliver 14 - 18 dwellings instead of the 5 or 6 proposed to be provided would be in the interests of the socio-economic interests of the community.

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