

**South Downs National Park Authority**  
Local Plan Examination  
Position Statement – Matter 11: Individual Sites

Land at Elm Rise, Findon (Residential Allocation SD71)



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## 1. Introduction

- 1.1 This Statement has been prepared on behalf of Seaward Properties, in support of the residential allocation at Elm Rise, Findon.
- 1.2 In accordance with the Revised NPPF, this site is being promoted as a suitable location for residential development, with a realistic prospect that housing will be delivered on the site within the next five years. This is evident by the positive pre-application discussions that have taken place since July 2018 (reference SDNP/18/03442/PRE) which are on-going with the South Downs National Park Authority (SDNPA).
- 1.3 The original representation to the Local Plan in September 2017 showed land to the north of the allocation as being utilised for residential development. This was also explored due to the request of the Findon Updated Neighbourhood Plan Working Group (UNPWG) in February 2018. However, it is the current intention to utilise this land to provide footpath connections and landscape enhancements associated with the allocated site (in accordance with policy SD71 Land at Elm Rise). Please note that this land is within the control of the developer and available.

## 2. Context

- 2.1 Findon is identified as a medium sized village located in the Dip Slope broad area of the National Park. It is regarded as a sustainable location, focused around a compact, historic core which has a number of local services and facilities, including small shops, pubs, primary school, village hall and post office. The settlement underwent significant expansion during the 20<sup>th</sup> century, particularly to the north-east of the village where the site is located, so much so that this area of the village is characterised by more modern estates and architectural styles.
- 2.2 The Statement of Common Ground (SCG03) confirms that the unmet housing need arising in the South Downs National Park area of the Arun District will be met through the provision of housing in the Arun District Local Plan 2011-2031. However, it is important to note that Arun have historically under delivered in terms of their housing need and despite having recently adopted their Local Plan, are once more unable to demonstrate a five-year land supply. The unmet need of c.9 dwellings annually within the SDNPA over the 19 years shown with the table (slightly higher now given the overall reduction in apportionment for Findon to 28 dwellings in Policy SD26) is unlikely to be delivered elsewhere in the district, despite the Memorandum of Understanding in place.
- 2.3 As of June 2018, there were 42 households identified in Findon requiring affordable housing, which is higher than the 24 households identified within the Housing Need Survey in 2013. This does not include households that would be legible for shared ownership properties. It is therefore crucial that any

emerging allocations include provision of affordable housing to address some of this identified need, a benefit of the site being promoted at Elm Rise, as opposed to the smaller sites being promoted elsewhere in the village.

- 2.4 Findon has a Neighbourhood Development Plan, which was made in December 2016 by the SDNPA. However, despite encouragement from the Local Planning Authority and other stakeholders, it failed to positively plan for its identified housing need. This inability to identify sites for future housing led to the Examiner deleting a number of policies as these would prejudice the village from meeting its housing requirement and did not meet the basic conditions required by the Regulations. The Examiner concluded in his summary that

*"The consequences are, that the allocation of housing sites and the establishment of a new settlement boundary that will accommodate rather than constrain the Parish's present and future housing needs, will now pass to the SDNPA. After careful consideration I conclude that there is sufficient sound policy in the remainder of the Plan to allow me to recommend that it proceeds to referendum but without the key housing policies"*

Findon Neighbourhood Development Plan, Examiners Report, 5 August 2015

- 2.5 At the time, the SDNPA provided reassurance that they would make the required residential allocations (in a similar way to other settlements in the National Park where there is not a Neighbourhood Plan) and this was noted in the Examiners report.

*"Reassurance from the LPA that the emerging Local Plan can take on the role of allocating housing sites and reviewing the settlement boundary"*

Page 12 of the Examiners Report, 5 August 2015

- 2.6 Given the date of the saved policies from the Arun District Local Plan (2003) which plan period ran until 2011 (adopted prior to the NPPF), the Examiner saw some merit in the remaining policies subject to modification. The Neighbourhood Plan then proceeded to referendum and subsequently adopted on this basis.

Following this decision, the SDNPA subsequently reviewed a range of sites and identified two housing allocations;

- SD71 Land at Elm Rise, Findon to deliver 15 – 20 dwellings (modified to 14-18 dwellings); and
- SD72 Soldiers Field, Findon to 10 – 12 dwellings

- 2.7 The SDNPA Consultation Statement indicate that a total of 8 representations were received directly on allocation policy SD71 Land at Elm Rise, which were both positive and negative (the later from the parish and the UNPWG). A summary of the main issues raised are discussed in section 3.

- 2.8 In the intervening period, an Updated Findon Neighbourhood Plan (UFNDP) underwent consultation (Regulation 14) in June 2018<sup>1</sup>. The UNPWG are seeking alternative sites that are detached from the

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<sup>1</sup> SS10a in the Core Document Library – Sites and Settlements: Findon Pre-Submission Updated Neighbourhood Plan

village on the southern side of the A24 which will give rise to major in principle landscape concerns (as indicated in the SDNPA response to the consultation, published within the Planning Committee Agenda for 9 August 2018, agenda item 10 and appendixes<sup>2</sup>).

- 2.9 The UFNDP in its current form, is not in conformity with the strategic policies of the emerging Local Plan (in terms of its proposed allocations given their lack of suitability in terms of landscape implications and poor relationship the existing settlement pattern. Furthermore, some of the housing allocations are situated within the current strategic and local gap (Area 6 and 11) Policy ES1 in the Arun District Local Plan 2003. Therefore, there is some conflict between the aspirations of retaining the downland village as distinctively separate from the wider suburbs of Worthing to the south.
- 2.10 There is also no guarantee that the UFNDP will proceed following examination (if it is found to meet the basic conditions which is disputed) or succeed at referendum. Therefore, this further highlights the importance of proceeding with the current allocations within the Local Plan. Otherwise this leaves Findon village open to speculative planning applications which is acute given the five-year land supply situation. In addition, if the Updated Neighbourhood Plan proceeds in its current form, it potentially opens up the UFNDP to legal challenge.

### **3. Issues and Responses**

- 3.1 This statement seeks to provide further commentary on representations made on the proposed allocation at Elm Rise, of which the SDNPA have responded to in turn (Main Issues Report SDNPA.2 and NPA Responses by Policy and Site INSP.2A).
- 3.2 While the original Seawards representation made in September 2017 with supporting landscape capacity study and Landscape Visual Impact Assessment (LVIA) provided a systematic appraisal of all sites available at that time, additional landscape evidence base and contextual analysis has been undertaken in support of the emerging planning application for the site. The methodology and viewpoints used include those identified by the UNPWG previously highlighted and importantly, the SDNPA agreed the approach to the updated LVIA.

#### **Landscape value, sensitivity and capacity to accommodate residential development**

- 3.3 Land at Elm Rise, situated within the village fringe, is the sequentially preferable site in landscape terms to accommodate a large proportion of the identified housing need of Findon. In summary, the main reasons for this are;
- It has a close relationship with the settlement edge. The existing dispersed settlement pattern with the interspersed vegetation and mature trees will reinforce the visually constrained and intimate character.

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<sup>2</sup> SS10 in the Core Document Library – Sites and Settlements: Response to the Pre-Submission Consultation on the Updated Findon Neighbourhood Plan, SS10b SDNPA Response and SS10c Legal Advice

- The capacity of this site is comparable to the capacity of adjacent fields identified within the landscape character and sensitivity assessment of Findon (2014)<sup>3</sup>. Adjacent fields to the north are of moderate sensitivity, moderate value and medium capacity. This assessment is also supportive of developing land adjacent to the settlement edge providing the strong edge is retained. It states that *'change can be accommodated within a strong edge that is likely to be less apparent within the wider landscape than in situations where the edge is weak'*.
- The small-scale nature of this development will maintain the sharp transition between urban area and 'Open Downs' identified in SDILCA<sup>4</sup>. The subtle, unprotected features of the historic landscape, such as hedgerows, trees and tracks that are vulnerable to change and loss will be protected and enhanced.
- Its pattern and enclosed characteristics no longer match those of the Open Downs
- New development may have localised effects but is unlikely to reduce the overall tranquillity levels
- Key landscape (and ecological) features defining this landscape type will remain protected. The site has the capacity and ability to deliver ecosystem services and embrace environmental opportunities through incorporating a network of green infrastructure; integrating SuDS, improving biodiversity, connecting and improving the Public Right of Way (PRoW) network in line with the SDNPA purposes.
- Retention of important vegetation and appropriate design will support the 'unlit village' status of Findon which is particularly important given the visual sensitivity of the adjacent landscape character area.
- The retention of the existing vegetation and trees around the perimeter of the site will continue to contribute strongly to the settlement edge and the wider character of the Arun to Adur Open Downs (A3).
- The only detrimental effect is likely to be the localised loss of potentially productive grade 2 and 3 land, classed as good to moderate under the Agricultural Land Classification. However, the fragile 'light chalk soils' that characterise the upper slopes and ridges will remain unaffected.
- Localised re-grading will accommodate site access and help to mitigate visual effects.
- The areas equestrian land-use and its historical association with the village of Findon will continue across the adjacent fields to the north. Providing a new footpath connection along its northern boundary, protects the hedgerow and supports the aspirations of the Findon Neighbourhood Plan for equestrian access and its presence around the settlement edge to *"be protected for the benefit of all."*
- The iterative design evolution means the understanding of the potential landscape and visual impact has informed the massing and arrangement of buildings on site, avoiding visually sensitive areas and mitigating other views through high quality design i.e. the Monarch's Way and from the A280 Long Furlong Road
- The visual strategy ensures that views from Gallops Farm PRoW to the north should remain unaltered.
- The important and sensitive views from the Conservation Area, and wider cultural associations with the village will remain unaltered by the proposals.
- Views towards Findon and its northern edge will remain absorbed within the characteristic vegetation and the stands of mature beech trees, a defining feature of the landscape planting found on higher ground.

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<sup>3</sup> The Landscape Character and Sensitivity Assessment of Findon West Sussex (David Hares Landscape Architecture, May 2014)

<sup>4</sup> South Downs Integrated Landscape Character Assessment (SDILCA) (2011)

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- The landscape strategy will strategically place trees on land to the north in key positions to avoid interrupting key views across the valley towards the church and ridgeline from the surrounding PRoW (in line with the site-specific requirements in the Policy SD71).
- The breath-taking views towards the village of Findon, set within the distinctive open and smooth rolling character, as seen from the South Downs Way and its historic forts at Cissbury Ring and Chanctonbury Ring will remain intact and unspoilt.
- The site's position on the lower valley sides will not affect views to and from the prominent secondary scarps (e.g. Chanctonbury Ring) and their open and undeveloped skylines that are vulnerable to change.



View 3a from Cissbury Ring across the Findon Valley

View 3a from Cissbury Ring across the Findon Valley



View 5d from The Monarch's Way footpath (2091\_1) approaching St. Johns the Baptist Church approximately 1km South West of the site looking North East

View 5d from the Monarch's Way Footpath approaching St. Johns the Baptist Church approx. 1km SW of the site looking NE



View 5b from The Monarch's Way footpath (2091\_1) approaching St. Johns the Baptist Church approximately 1km South West of the site looking North East

View 5b from the Monarch's Way

- 3.4 In light of this further evidence undertaken, Terra Firma Landscape Consultants confirm that a landscape-led approach can maintain a settlement edge character. This is largely done by separating the site into three component parts, through a high-quality design and layout which responds to the constraints and opportunities identified (such as maintaining mature trees on its boundaries and

following the existing topography). It will allow uninterrupted views across Findon Valley. The Landscape response includes built-form under the 77m contour line and areas above this forming part of open space, strengthening existing green infrastructure along with other informal grass verges proposed, reflective of the surrounding character to the west. The dwellings at the highest part of the site will be one and half storeys in height, albeit will be seen within the context of existing dwelling to the east which sit higher on Stable Lane. Materials strategy will also assist in integrating the development into its surroundings.

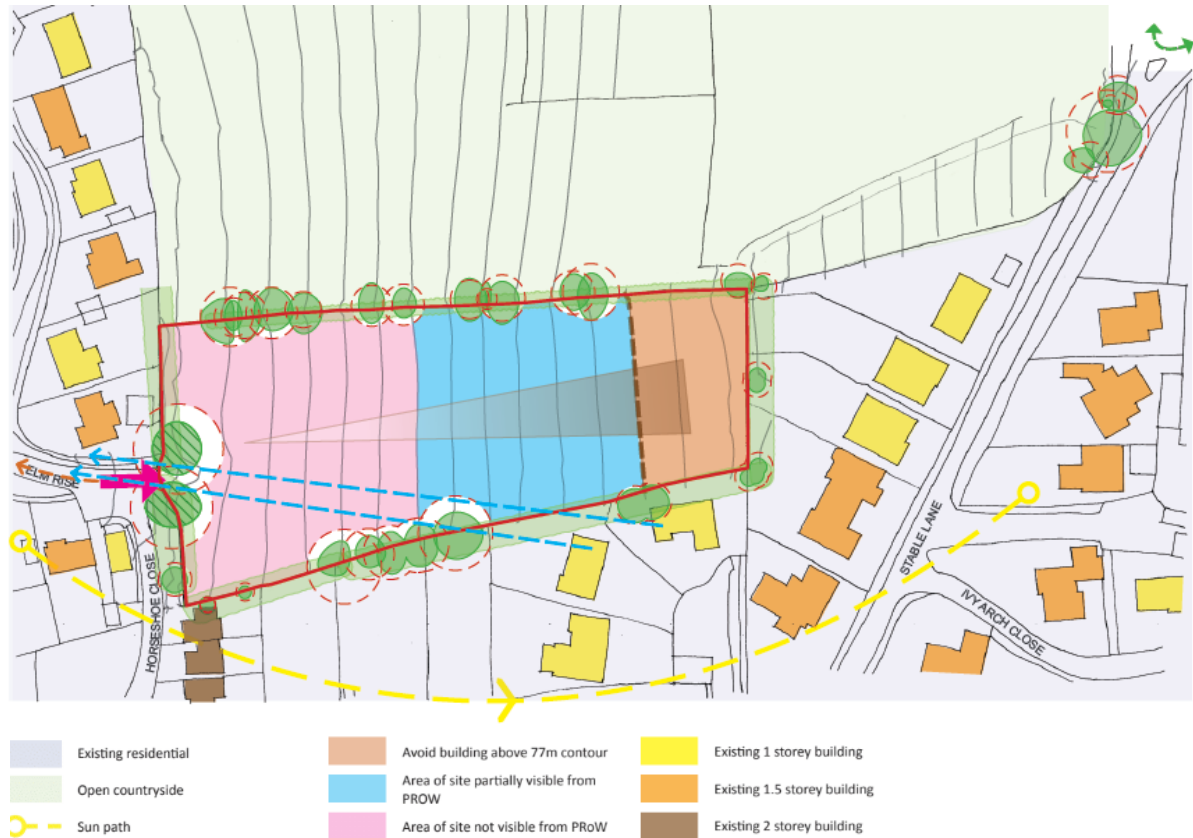


Figure 1: 17113/CO1 Constraints Plan

- 3.5 We disagree with the UNPWG and Hutchison, 2014 who argue that the respective landscape capacity levels applied to the site differs against that within Hares (2014), as “Low/Negligible” capacity to accommodate development due to being “...highly visible from Long Furlong, Gallops Farm Road and the top of Stable Lane”. It is both our opinion and that of the SDNPA, the site has medium capacity especially as the lower parts of the site are not visible from the west. The most elevated parts of the site can be sensitively treated as highlighted in the site-specific requirements. Please see the below emerging landscape strategy and illustrative layout for the site, demonstrating a minimum of 18 new dwellings can be accommodated successfully in line with the National Park Purposes and Duty (please see figure 3). We conclude that the site has the ability to accommodate a minimum of 18 new dwellings within the confines of the allocation boundary (Policy SD71).

### Local Preference

- 3.6 The South Downs Local Plan has undergone public consultation and only a handful of respondents have raised concerns regarding this particular housing allocation. The site at Elm Rise is considered to be the most suitable, available and achievable site to provide the modest level of housing growth

proposed for the village, including the provision of affordable housing. Alternative sites being promoted by the UFNDP give rise to fundamental landscape concerns, as supported by the findings in the SHLAA 2016 and the SDNPA response to the consultation. Furthermore, the survey had a limited response rate and was later excluded from further community engagement undertaken. The alternative suggestion of Midhurst taking some of this need, will not assist in meeting the acute affordable housing need identified for people with a local connection to Findon.



Figure 2: 17113/CO2 Opportunities Plan

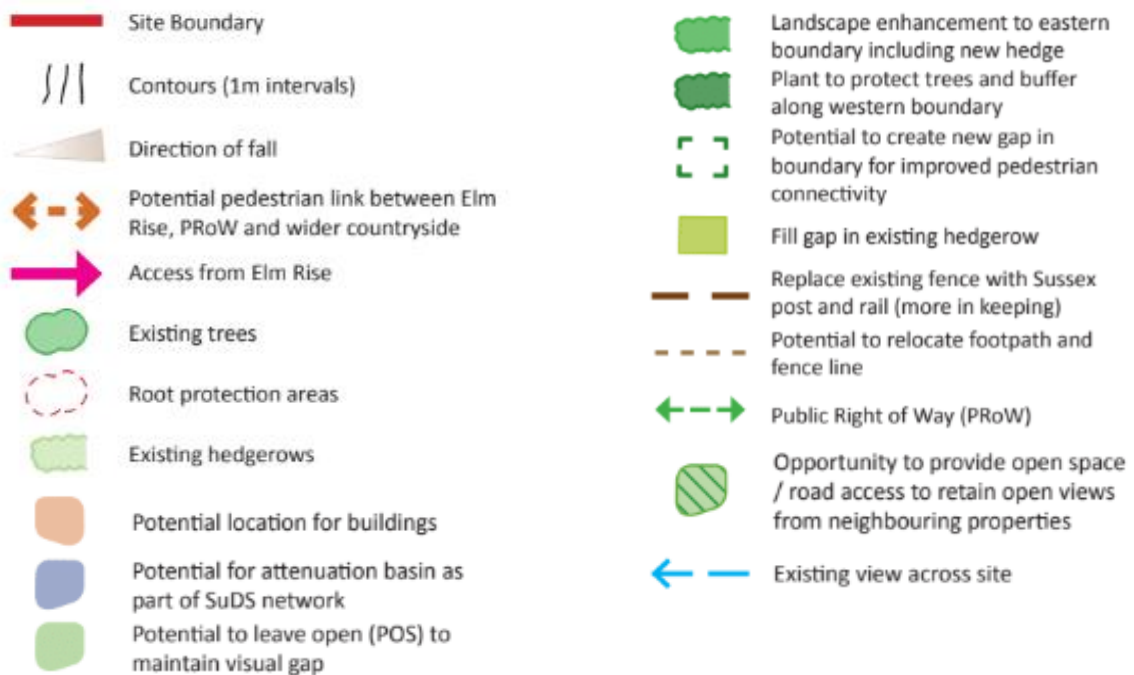






Figure 3: 17113/SK24 Illustrative Sketch Layout, demonstrating that 18 dwellings can be successfully accommodated

### **Flooding Issues**

- 3.7 The site is located within Flood Zone 1 and is not at risk of flooding from tidal or fluvial sources or overland flows. There are no historic records of flooding from any source affecting the site or immediate area. However, ground water monitoring will be undertaken in due course to confirm seasonal groundwater levels.
- 3.8 The geology of the area is predominantly alluvium over chalk and is anticipated to provide suitable infiltration to accommodate an infiltration drainage system, with water quality improvement provided.
- 3.9 Foul drainage will be discharged by gravity to the existing public sewers beneath Horsham Road to the west of the site. This will all be assessed at application stage, in accordance with Policy SD49: Flood Risk Management, which seeks to reduce the impact and extent of all types of flooding.

### **Loss of Paddocks**

- 3.10 The agricultural land value of the site is Grade 2 and 3, which is classed as good to moderate. The modest loss of grazing land is considered appropriate given the identified local housing need, including the provision of affordable housing, alongside the other benefits that the development will bring. This will include a new footpath connection to Stable Lane and the wider public right of way network. The new connection will provide direct views of the wider paddocks on the fringes to the north which will

be retained alongside public uninterrupted views of the wider valley. Whilst it is acknowledged that equestrian heritage is considered important to the local community, given the two racing stables, livery and training opportunities and breeding, that occurs on the fringes of the village, the allocation will maintain an edge of settlement relationship with wider paddocks.

### **Traffic Generation**

- 3.11 Findon is considered a relatively sustainable settlement, where sustainable modes of transport will be encouraged, especially given its proximity to Worthing and the wider south coast. Proximity of the village within easy walking distance and PRoW will provide recreational opportunities for the new residents without the need to use the private car. The proposed development is modest and considered proportionate to the size of the village, utilising the existing estate road. A safe and suitable access can be created into the site and will not give rise to any traffic issues.

## **4.0 Conclusion**

The SDNPA encouraged the Neighbourhood Planning Group to allocate sites, over a number of years. Unfortunately, they did not seek to do so.

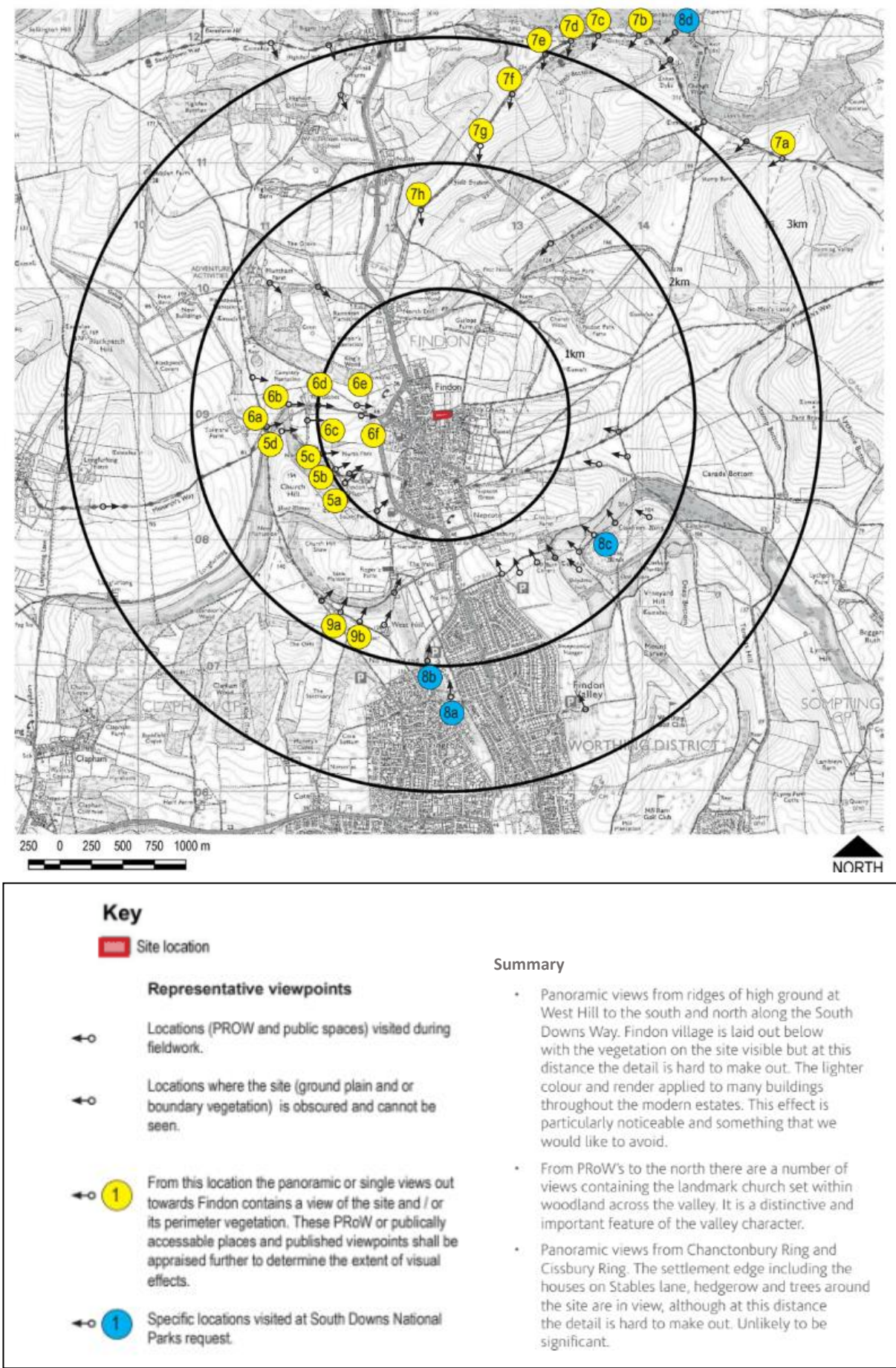
It was also made clear at the time by the examiner that the Neighbourhood Plan could only proceed on the basis that the Local Plan would make the required allocations. This has been subject to consultation with the public and we have made representations during the course of the Local Plan.

Landscape analysis has been undertaken by us, which accords with the results of the Authorities' own analysis, that demonstrates that not only does the site have the best capacity of all those in Findon to accommodate landscape change but also provides opportunities to enhance the wider landscape character of the area alongside new footpath connections.

Officers have reviewed the alternative allocations proposed in the Updated Neighbourhood Plan consultation, but these have raised landscape issues, do not relate to the existing settlement pattern and some are even questionable whether these are deliverable due to the associated constraints. This is all consistent with previous call for sites the South Downs have carried out, where by nearly all sites were rejected (apart from one considered windfall and two allocated).

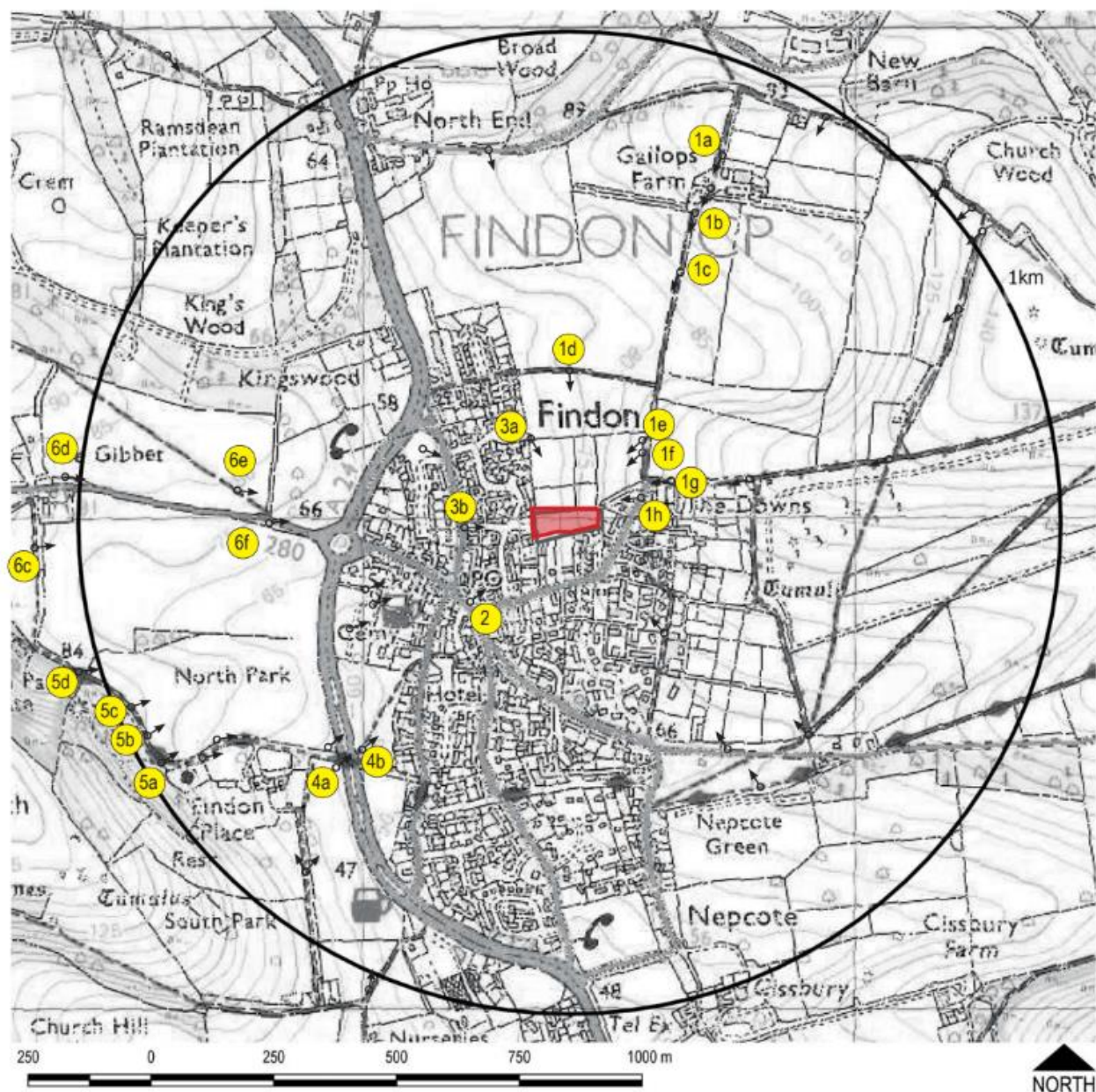
A high-quality design and illustrative layouts produced demonstrate how a development could be achieved in accordance with all the emerging policies of the Local Plan and the relevant policies of the currently adopted Findon Neighbourhood Development Plan (2016). This demonstrates that 18 dwellings can be successfully accommodated at the site. Feedback from the local community has also been incorporated alongside affordable housing provision. This has been detailed in both our representations to the Local Plan and the current pre-application under consideration.

Appendix One





## Appendix Two



- From Footpath 2789 to the north the site itself is screened by intervening hedgerow and paddock.
- From PRoW 2086 (gallops farm) and 2789 are glimpsed views through vegetation of the site vegetated boundary.
- Only trees along the southern edge of the site are visible from the Conservation Area. Views are generally contained by buildings that surround the historic village core.
- No views found from Areas of Open Space (Nepcote Green)
- Close to the site, the majority of the site is well-screened by mature trees and vegetation along the front boundary (which is to remain).

### Summary:

The site is visible from two national trails: Monarch's Way along the western valley side and South Downs Way arriving from the north.

There are no views of the site from the Monarch's Way as it arrives into Findon from the east or from the South Downs Way 3km to the north and to the west of the A24.

SDNP Viewshed Study - Viewpoints and Landmarks  
No view of the site from 8.Cissbury Ring and 9.Chanctonbury Ring.