

# South Downs National Park Authority Local Plan Examination – November 2018

## Position Statements

### Representations by Gillings Planning on behalf of Mr C Hobden

#### Background

Our client Mr C. Hobden owns the site, Soldier's Field House, in Findon. The property and its curtilage is proposed to be allocated for 10-12 dwellings under draft policy SD72. Our engagement with the Local Authority, on behalf of Mr Hobden, has been ongoing and we have recently undertaken pre-application discussions. The site is available for development and should be considered to be both suitable and deliverable for residential development. The allocation is therefore supported in principle, albeit with minor wording amendments suggested to ensure the policy is sound.

Where possible, we have also engaged with the Neighbourhood Plan Group and note the recent proposals to update the plan with 'alternative allocations'. Further comments with regards to the proposals for the updated plan are set out below.

#### **Matter 10 – Issues Relating to Specific Settlements (Policy SD36)**

**Matters which affect the soundness of the Plan in relation to a whole settlement, including with reference to any suggested MMs.**

#### **ISSUE A. Whether the settlement boundary is appropriately defined**

Our client fully supports the settlement boundary as proposed in the Local Plan as it seeks to appropriately enclose the Soldier's Field House site.

#### **ISSUE B. Whether Local Green Spaces are appropriately defined**

No comment

#### **ISSUE C. The relationship of the provisions of the plan for the settlement in relation to the relevant Local Neighbourhood Plan**

Findon Neighbourhood Development Plan (FNDP) was made in December 2016. As the Inspector will be aware however, when drafting the made plan the Qualifying Body chose not to allocate sites (despite being advised otherwise at the time) and as such the made plan does not include any site allocations. The examiner allowed the plan to proceed on the basis that the SDNPA would allocate sites for Findon via the Local Plan. The SDNPA duly identified housing allocations, including Soldier's Field House, in its pre-submission Local Plan however the Qualifying Body for the NP did not support these allocations and has, as a result, begun the process of updating the FNDP with alternative allocations for housing.

The respondent fully supports the LPA's stance with regards to the FNDP (as set out in the Director of Planning's response to Planning Committee on 9<sup>th</sup> August 2018). Indeed, Gillings Planning has also responded to the updated Neighbourhood Plan on behalf of Mr Hobden and raised concerns about the nature of the alternative allocations (representations made in August 2018) on the basis that they do not conform with the emerging Local Plan and that the alternative sites have issues of deliverability. We would question, in particular, the allocations HD10 and HD11 noting that these were assessed in the 2016 SHLAA and rejected on the basis

that they "would not reflect the character of the surrounding area in terms of settlement form, and would not provide adequate access to local services".

Further, the planning practice guidance states that "Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new Local Plan" (Paragraph: 009 Reference ID: 41-009-20160211). Given the emphasis of the revised NPPF on housing delivery, if the Qualifying Body feels strongly about allocating these alternative sites, a more appropriate solution would be to allocate these as reserve sites, in addition to those already proposed in the Local Plan. This would ensure emerging evidence of housing need is addressed.

To summarise, with regards to the FNDP, we support the Local Authority's position and conclude that the Local Plan examination is not the time to deliberate the proposals for an emerging and updated Neighbourhood Plan.

Notwithstanding our views on the alternative allocations, we reiterate that the site at Soldier's Field House is suitable, available and deliverable for residential development and would adequately fulfil part of the housing requirement for the settlement.

#### **ISSUE D. Whether appropriate protection is provided for 'niche' interests.**

No comment.

#### **Other Issues**

Our client supports the overall housing number for the settlement and the nature in which this has been apportioned between the two sites proposed for allocation. The proposed allocations at Soldier's Field and Elm Rise are necessary and appropriate to fulfil the housing need for the settlement.

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#### Matter 11 – Issues Relating to Individual Sites

**Matters which affect the soundness of the Plan in relation to its Strategic Site Policies SD56-57 and its individual Allocation Policies SD58 to SD96, including their stated criteria for the development or redevelopment of the sites, the physical extent of the sites, their potential planning effects and any suggested MMs to the policies.**

Gillings Planning has previously submitted representations in relation to draft Policy SD72 at the pre-submission stage in November 2017. Overall, our client, the owner of the site, wishes to support the allocation of Soldier's Field House for residential development.

We do however maintain our objection to the precise wording of the policy as set out in our previous representations although we will not repeat them here.

Our client would like it to be noted that the site is available for development and has not been sold, nor is the site on the market. The site was temporarily for sale however it has since been removed so that the owner can focus on securing planning permission for the allocated site.

With this in mind, pre-application discussions have been undertaken with the Local Authority, indicative of our client's intentions to progress the development of the site in the short-term.

The initial pre-application was based on a preliminary scheme for 16 dwellings in order to test the capacity principles for the site. The response from the Authority was very helpful and provided guidance that will help to inform an amended and more detailed scheme. The Authority's pre-application response confirmed that:

*"The site has been allocated in recognition that redevelopment of the site provides an opportunity to deliver modest-sized dwellings that better meet local housing needs as well as an opportunity to improve the character of the area and enhance views of the site, through a design and layout that better responds to the traditional architectural styles seen in Findon".*

Indeed, from a landscape point of view, we also note the comments made by Veronica Craddock on behalf of the SDNPA earlier in the examination process regarding the robust nature of the SHLAA assessment and the extent to which the landscape and matters of visual sensitivity were taken into account when assessing sites for allocation.

With regards to the number of dwellings, officer's consider that although *"10-12 units could be successfully achieved"* landscape evidence may justify a figure in excess of 12. Officers commented that *"were the landscape evidence able to support this density, and a higher number of dwellings may allow the provision of a larger ratio of affordable units which would be a policy argument to be considered"*.

Following the detailed pre-application response, our client's team is commencing preparation of the relevant technical information to progress a revised scheme for the site. Development of a revised scheme will take into account the following advice received in response to the preliminary pre-application:

- Providing an appropriate mix of dwelling sizes and tenures.
- Use of landscape evidence to inform proposals for the site in terms of layout and design to ensure a landscape-led approach;
- Responding to contextual analysis of the site and the development pattern of the surrounding area.
- Considering local built form and positive design elements. Using materials to reflect local vernacular.
- Whilst the site is predominantly managed garden and *'likely to be mainly of low ecological value'*, the peripheral habitat may be suitable for protected species.
- There is a TPO blue cedar tree in the south eastern corner of the site, officer's consider that the TPO is *"...not a native species, and somewhat incongruous to the softened settlement edge that the SDNPA would like to achieve. The TPO is therefore not considered of itself to be a block to development, and if the layout of the final proposal would benefit from the tree's removal, you could seek this via a separate TPO application, providing that suitable compensation planting could be achieved that would mitigate its loss."*
- Provision of a Transport Assessment to inform highway, parking and access considerations.
- Inclusion of a SuDS scheme.

As advised, consideration is also being given to:

- Any parts of the site that are susceptible to surface water/groundwater flooding;
- Views into and out from the site.
- The characterisation of the settlement edge in Findon and considering the removal of the beech hedgerow
- Potential to reduce light pollution

Our initial pre-application discussions have helped to confirm the Authority's view on the principle of development as well providing a focus on the main issues that need to be considered in defining the scale, layout and details of the proposals.

In our view there are no insurmountable impediments to developing the site and proposals for the site are progressing in response to guidance from the Local Authority.