



South Downs National Park - Local Plan Examination

Position Statement - Matter 10 & 11 for Sheet and Policy SD89 – Pulens Lane

Respondent Number: 143 WYG and Andrew Caesar-Gordon obo Residents Action Group

Background to explain concerns about Sheet

1. WYG submitted representations to the pre-submission version of the Plan objecting to the inclusion of this site due to the history of concerns that have consistently been raised on planning grounds. WYG has been engaged by the local Residents Action Group that represents almost every adjoining property. Over 70 representations were received by the SDNP against the proposed allocation.
2. We have set out in our representations and explained at the first hearing session into matter 4, that our position is that the Joint Core Strategy for East Hampshire (Document EX01) covers 2011 – 2028 and the Petersfield Neighbourhood Plan runs from 2013 – 2028. However, the SDNP Local Plan runs to 2033 and therefore there are five years at the end of the local plan period where no housing has been identified for Petersfield.
3. We believe that as Petersfield is the 2nd largest settlement in the National Park that this is not a sound way to plan for future growth. The Joint Core Strategy identified a minimum of 700 dwellings and the Petersfield Neighbourhood Plan met that requirement and purposely identified more housing to give a 10% buffer (see section 3.3 of the Neighbourhood Plan) and therefore allocated sites for up to 805 dwellings to 2028.
4. The Neighbourhood Plan is explicit that they purposely only looked at sites up to the end of the plan period of 2028 (see section 3.3 of the Neighbourhood Plan, point 2). Therefore, we believe that if they had been asked to look for a further 5 years that they could have found other sites in Petersfield and those sites would be much more sustainable than identifying a site in Sheet, which a previous Local Plan Inspector identified as being in a “peripheral location far from the main facilities of the town.” (This is set out in our submission).
5. We believe that the Local Plan is therefore short of around 270 dwellings for Petersfield (the Neighbourhood Plan allocated sites for 805 dwellings over 15 years so 54 dwellings a year multiplied by 5 years). The Local Plan makes clear that they have simply adopted the Neighbourhood Plan figure (see Figure 7.2 of Local Plan) and not addressed the fact the dates don't match up. Any





review of the Petersfield Neighbourhood Plan would start with the South Downs Local Plan which currently only identifies a need for 805 dwellings up to 2033 so there is no incentive for them to find additional housing.

6. At the first hearing sessions the National Park Authority acknowledged there was a gap and that this difference in years hadn't been 'bottomed out'. We believe that if the Local Plan had looked again at finding additional sites in Petersfield for around 270 dwellings then that would have opened up other larger sites for further consideration rather than trying to find sites outside of Petersfield that are not suitable.
7. There are around ten other sites in Petersfield that were rejected in the SHLAA as not suitable that are closer than this site to the facilities in the town centre and we believe this site has only been included as the desire was to not look at Petersfield afresh as it had a Neighbourhood Plan. This resulted in trying to find sites in Sheet and other settlements instead of identifying a housing need across the Park and then looking at all settlements and sites on an equal basis.
8. We believe that if this allocation had been done properly then this site, that has been rejected in two previous Local Plan examinations due to the peripheral location, significant nature conservation concerns, traffic concerns, and environmental objections would not be under consideration now. While the two Local Plans were 1991 and 1994, it is clear that nothing has improved since then with a refusal of planning permission by the South Downs National Park Authority itself in 2016 again due to impact on the countryside, environmental concerns, the impact on the listed building, and concerns about ecology, amongst other reasons. This was only an application for five dwellings and yet the Authority very soon after allocated the site for 30 – 32 dwellings. Following representations this has now been reduced to 15 – 18 dwellings as recognition that the site has technical problems and significant environmental concerns.

Site Specific concerns

9. For a site to be allocated in a local plan it is meant to be capable of being delivered in the life of that plan and therefore there must be a reasonable assurance the site can actually be delivered and there are no technical 'showstoppers'. Once a site has been allocated then it is expected that it can be delivered as the principle of development has been established.
10. The NPPF (2012) requires in the core planning principles that the planning system should be planned and provide a practical framework within which "decisions on planning applications can be made with a high degree of predictability and efficiency" (para. 17). There is also a requirement to "conserve and enhance" the natural environment, "Allocations of land for development should



prefer land of lesser environmental value”, conserve heritage assets, and ensure safe and suitable access for all people (para. 17).

11. The access is not suitable for the development. The South Downs own evidence base accepts this as 'The South Downs Local Plan: Site Allocations Highway Assessment' is part of the evidence base (attached as appendix 5 of our objections). The site is considered under 'HA40 – The Old Riding School, Sheet' and states it is "suitable only for single vehicle access" and that "refuse wagons and emergency vehicles would have difficulty in negotiating into and out of the access" as they would cross onto the other carriageway. The track is 80m long with no opportunity to provide passing areas and the report states the traffic "is likely to result in congestion along the track, with opposing vehicles having to reverse back to allow passing. The situation could result in safety issues and may raise objections from the existing residents."
12. The report points out that while the planning application suggested the track could be widened to 4.8m "it is difficult to identify from where this additional width can be gained" and goes on to advise only 3.2m is achievable. It confirms that even if 4.8m was possible "it is doubtful whether this could accommodate any safety strip for pedestrian use." Therefore, pedestrians would be forced to walk along the trafficked area for the whole length of the track which doesn't meet any sense of a safe access for all users, never mind those that are mobility impaired.
13. It is not understood how the site allocation proceeded past this stage against the Council's own highway advice.
14. The ecological concerns have also not been addressed with the information (contained in Appendix 6) from Hampshire County Council Biodiversity Information Centre concluding that the site does "provide an important buffer between Petersfield and a substantial area of SINC habitats and adds wildlife value to the SINCS along the River Rother valley." Again, it is not clear how this has been, or can be, addressed and this should be of considerable importance in a National Park.
15. Our submission also sets out the concerns of a previous Local Plan Inspector that housing on this site would degrade the conservation interests.
16. Landscape concerns have not been addressed and housing would be damaging to the River Rother valley landscape.

Updates from South Downs National Park

17. The National Park Authority produced a further Highway Assessment Report in April 2018 to try to address the significant concerns they had raised in their previous comments. This considered



Pulens Lane under SD89 and reconfirmed that the access track is only 3.2m wide and that it was not sufficient to just incorporate the vegetation along the access track.

18. It tried to offer two options to resolve the concerns they had raised but these offer no reassurance that the site can be delivered. Option 1 suggests a third party house *could* be bought and a new access *could* be achieved. Bearing in mind most of the residents of these houses are supporting the Residents Action Group this is a possibility with little substance and no evidence has been given to illustrate a third party property meets highway concerns or is viable.
19. Option 2 then bizarrely suggests buying a 3m wide strip of land from 16 and 18 Pulens Lane to allow the footpath to be achieved and to allow the access around the bend to be improved so it was safe. This would also allow the junction to be properly constructed so the emergency vehicles and refuse wagons can safely access and egress the site. It states that number 18 would lose a garage but number 16 "would require complete demolition" or possibly part demolition if viable to leave the rest of it.
20. The objector listed alongside WYG as respondent 143, Mr Andrew Caesar-Gordon, owns number 16 Pulens Lane and has never been approached about this option and has no intention of selling. Therefore, this option lacks any credibility that it can be achieved or is viable.
21. The National Park Authority has also produced a Development Brief to seek to address the concerns but again, this provides no reassurance. The first half is broadly generic about good design principles and then offers an analysis of issues on page 25. This points out that the site lies within Flood Zone 3, has mature/ veteran trees, and that protected species associated with wet woodland and riparian habitats are likely. Page 28 talks about the listed building but offers no assessment of the setting of the listed building or whether a planning application can address this either in terms of the access coming past it or the buildings being located near to it. The 'design principles' section of the Development Brief does not even mention the listed building.
22. The rest of the document sets out design principles and ideas but offers no solutions to the problems identified, just good ideas that should be sought if possible. It points out that part of the site lies within Flood Zone 3 but does not advise what the impact of this is or whether other sites were considered that were not at risk of flooding.
23. The document simply states that there must be a suitable access and egress and visibility splays and that detailed access considerations will be considered through a detailed planning application (page 43). The document therefore makes no attempt to resolve any of the technical concerns and simply hopes that a planning application can somehow deal with the problems. This is not



good planning as the site should only be allocated if there is a reasonable expectation that it can be delivered and that there are no in-principle issues that cannot be resolved.

Conclusion

24. We believe that the myriad number of technical issues demonstrate that there can be no certainty that the site can be delivered. The access (which the Highway Authority has confirmed has not been demonstrated to be safe), landscape impact, damage to the setting of the listed building, ecology are considerable issues on their own and together make the site unsuitable for development.
25. We remain completely unclear about how this site can be refused planning permission in October 2016 for only five dwellings with (effectively) six reasons for refusal with all six reasons referring to the proposal being contrary to the National Park purposes and then the following year it was proposed for 30 – 32 dwellings with none of the technical issues properly addressed.
26. It is our view that this happened as there was a desire to find some housing for the Local Plan but as Petersfield was excluded then sites on the edge of Petersfield but actually in Sheet were picked instead and if Petersfield had been appraised again then more sustainable and less constrained sites would have been found.