
Examination Statement

South Downs National Park Authority

Emerging Local Plan

Land at Sweetland, Steyning

CALA Homes

Examination Statement

Land at Sweetland, Steyning



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1. Introduction

- 1.1. This Examination Statement is submitted by Savills on behalf of CALA Homes. CALA Homes are promoting the Land at Sweetland, Steyning in conjunction with the landowner (herein referred to as 'the Site'). The location of this Site and its merits as a sustainable location for residential development are outlined in the Regulation 19 representation (summarised below). The Site is within the National Park boundary but adjoins the settlement of Steyning which is within Horsham District.
- 1.2. Prior to the submission of the emerging Local Plan, CALA Homes submitted representations to the Regulation 19 consultation in November 2017 held by the South Downs National Park Authority (SDNPA). These representations highlighted a number of concerns in respect of the emerging Local Plan including:
- Insufficient consideration of settlements outside the National Park in the Spatial Strategy and inadequate assessment of sites for allocation;
 - Potential overreliance on Neighbourhood Plans to deliver "non-strategic" allocations and no flexibility should a Neighbourhood Plan be delayed or not produced;
 - Removal of wording from Policy SD25 as originally drafted in the 2015 Preferred Option Plan which provided flexibility for small sites within the National Park on the edge of settlements that are themselves outside the Park to come forward;
 - The need to include adjacent settlements, such as Steyning, within Policy SD25 and to provide a housing target for such settlements where they can deliver housing within the National Park;
 - Consider allocation of additional residential sites;
 - Housing targets in Policy SD26 should be reworded to be a "minimum" target;
- 1.3. CALA homes also submitted an Examination Statement to Week 1 of the Local Plan Examination in relation to the Duty to Cooperate, Matter 2 Strategy and Matter 4 Housing Need and Supply.
- 1.4. CALA Homes are a member of the Home Builders Federation (HBF) and this Examination Statement supports and builds upon evidence submitted in the statement made by HBF to the Local Plan Examination.
- 1.5. This representation relates to Matter 10 – Issues Relating to Specific Settlements and Matter 11 – Issues Relating to Individual Sites. In line with the Inspector instructions this Statement focuses on issues of soundness.

2. Response to Inspectors Questions

- 2.1 In respect to matters 10 and 11 CALA Homes principle comments is that the wider Local Plan strategy has excluded certain settlements from the spatial strategy and therefore has limited the potential for sites in these locations to come forward including via emerging Neighbourhood Plans. This has resulted in the Local Plan not being positively prepared or effective and therefore not being sound.
- 2.2 The SDNPA are in a unique position with the National Park spanning 15 other local planning authorities making cross boundary strategic planning particularly important. The interface between settlements and communities on the boundary of the National Park is a challenging issue for the SDNPA to address as these often provide valuable services and facilities to the communities of the National Park. However as currently drafted the emerging Local Plan does not support development in these peripheral locations and this could lead to negative impacts on these settlements and their communities. In turn the communities of the National Park that depend on these settlements to provide services and facilities and provide a gateway for visitors to the Park. Due to this the Local Plan is therefore not considered to be positively prepared or effective.
- 2.3 Neighbourhood Plans which include areas within and outside the National Park include Henfield, Hassocks, Pulborough and Lynchmere. The settlement of Steyning is an example of a location where the policies of the Local Plan have the potential to limit sustainable development and prevent allocation of housing through the emerging Neighbourhood Plan.

Settlements & Sites

- 2.4 Section 7a of the submission Local Plan outlines that: *“there are 53 settlements that are well-placed to accommodate some level of growth as set out in Policy SD25”* and that this is the basis of the framework for accommodating local housing, employment and other development needs of communities (para 7.4) as outlined in policies including SD36.
- 2.5 At paragraph 7.5 the Plan recognises that Neighbourhood Plans *“constitute an important element to the statutory development plan”* and that many of the settlement identified have emerging or adopted Neighbourhood Plans. Neighbourhood Plans are identified as reflecting the *“vision and objectives of the local community and should help to deliver the objectives and strategy of the Local Plan by making positive provision for development in line with Policy SD25”*.
- 2.6 The Neighbourhood Development Plans Background Paper (March 2018) includes the Steyning Neighbourhood Plan in Appendix 1 along with a number of other emerging Neighbourhood Plans with cover areas that are partially within the National Park. The identification of these Neighbourhood Plans in this evidence acknowledges their importance in delivering development in the National Park
- 2.7 The Local Plan identifies Steyning and 6 other settlements as “Gateways” which are *“just outside the National Park”*. Paragraph 3.5 defines these as: *“settlements outside the South Downs with good bus, ferry or rail links to the wider region and beyond, and bus and cycle links into the National Park”* and these settlements

are acknowledged in the Plan to assist in meeting the objectives of the National Park.

- 2.8 Gateway settlements and other settlements on the boundary of the National Park are not considered to have been adequately assessed within the evidence base and have not therefore be assessed for their potential to deliver housing within the National Park. This is particularly important given that the Local Plan does not meet the Objectively Assessed Housing Need (OAHN).
- 2.9 The Options Consultation document (2015) outlined a number of issues to be considered when preparing the Local Plan including “*Issue 27 – How can the Local Plan best take account the adjoining settlements outside the National Park?*”. At paragraph 6.27 it is stated that: “*In developing a settlement strategy for the National Park it is important not to treat it as an island. Just outside the designated area are a large number of towns which provide services, facilities and jobs for the National Park residents and whose residents’ represent important ‘consumers’ of the National Park’s special qualities. Some of these places can also perform important gateway functions for those arriving to enjoy the National Park*”. Paragraph 6.31 outlines that: “*There may be a difference between how these matters are dealt with in different parts of the National Park. In the more central parts of the National Park settlements are more self-contained (especially around Petersfield and Midhurst), whilst in areas closer to the boundary the settlements appear to be more dependent on adjoining large towns outside the National Park...as well as on smaller towns along the boundary, for example Bishop’s Waltham, Alresford, Alton, Liphook, Haslemere, Pulborough, Storrington, Steyning and Hassocks.*”.
- 2.10 Paragraph 6.32 outlines that: “*While the Local Plan cannot set policies for sites outside the National Park, its settlement strategy should recognise these destinations and gateways*”. SDNPA clearly therefore recognise the importance of border settlements however the strategy in the Local Plan on settlements has not reflected this.
- 2.11 The Options consultation also includes: “*Issue 28 – What approach should the Local Plan adopt for development proposals on sites within the National Park that adjoin settlements outside the National Park?*” and outlines options under which, provided there are exceptional circumstances, such sites can be granted planning permission. These options do not appear to have been brought forward into the submission Local Plan and are not specifically addressed at any point in the Plan. SDNPA outlined in the Progress Report (ref: LP02) that “*Neither of the previously suggested options has been taken forward, since there is no specific criterion in Strategic Policy SD22: Development Strategy on relationships with settlements outside the National Park*” however this could be overcome through minor amendments to policies within the Plan allowing for Neighbourhood Plans to address these boundary locations.
- 2.12 It appears therefore that despite earlier versions of the Plan and evidence base acknowledging the importance of these settlements and neighbourhood plans the submission Local Plan has not reflected this. The result of overlooking the boundary settlements within the emerging Local Plan is that potential development sites may have been overlooked. There is potential that such sites which are within the National Park but on boundary and are well related to settlements outside of the park could, with mitigation such as landscaping and boundary planting, present sustainable locations for growth. These locations have the potential to benefit both the communities within the National Park and those within Gateway settlements.

Implications for the Local Plan

- 2.13 The impact of SDNPA overlooking the relationship between settlements outside but on the boundary of the National Park and emerging Neighbourhood Plan which include areas both within and outside of the National Park, has resulted in the soundness of the Plan being compromised. Specifically the issues of soundness relate to whether the Plan is positively prepared and effective as outlined at paragraph 182 of the NPPF (2012).
- 2.14 In order to be considered to be positively prepared the Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. By not considering the relationship between boundary settlements and the National Park and therefore not considering potential development sites in these locations, the Plan cannot have sought to meet their objectively assessed needs or be considered to have been prepared based on a strategy which is positively prepared.
- 2.15 In respect of being effective this requires the plan to be based on effective joint working on cross boundary strategic priorities which include housing. The strategy of SDNPA when preparing the Local Plan has failed to consider the potential of boundary settlements and indicates that development outside of the National Park even in boundary locations should be directed away from the Park. This generalised view taken forward into the strategy has not considered factors such as the ability of boundary settlements to expand. For example at Steyning the settlement is constrained by existing permanent boundaries including the A283 which runs along the boundary of the settlement to the north and east creating a barrier to any expansion in this location. The strategy of the Local Plan is therefore blocking future development in the settlement with little or no regard to specific sites and potential mitigation measures. The failure of the strategy to consider these issues results in the strategy not being considered to be effective. Due to not being positively prepared or effective the Local Plan cannot be considered sound.

3. Conclusions

- 3.1 The emerging Local Plan in its current form is not considered to have adequately considered the important relationship between the National Park and settlements on its border and the Plan does not include adequate guidance or policy on emerging Neighbourhood Plans which span across boundaries of the Park allocating development sites. The result of this is that potential development sites within the National Park in these boundary locations may have been overlooked for inclusion in the emerging Local Plan and there is no clear guidance for Neighbourhood Plans to allocate these sites.
- 3.2 The emerging Local Plan could however be amended via Main Modifications and the production of additional evidence in order to rectify these identified issues. SDNPA should consider the following amendments:
- Undertake additional work in respect of the capacity of sites to deliver development and the reassessment of available sites including any potential mitigation in order to increase the supply of housing delivered within the Park over the plan period and thus reducing the unmet need. This should include assessment of the Land at Sweetland;
 - Reconsider the relationship between communities inside and outside of the National Park and how these communities rely on one another to deliver development and services. This includes the settlement of Steyning which is directly adjacent to the National Park boundary and which is constrained in terms of land available to deliver development. Opportunities to secure development which would result in benefits to communities inside and outside of the Park should be reconsidered by the SDNPA;
 - Secure additional guidance and flexibility in respect of emerging Neighbourhood plans to ensure that all potential sustainable development can be delivered;
- 3.3 The proposed amendments outlined would ensure that the Local Plan is based on robust and up to date evidence and secures the maximum development possible in order to support the National Parks local communities and those outside the Park. This will ensure the long term sustainable development of the National Park and can be achieved whilst protecting the special landscapes of the National Park.

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