

Harting Parish Council [R407]

Position Statement: SD90 Land at Loppers Ash, South Harting

(2017 SD90 Consultation Comment: #576)

In this Position Statement, Harting Parish Council (hereafter ‘the Council’) argues that the cumulative adverse and negative impacts of site allocation SD90 are substantial in planning terms, particularly in the context of a National Park. A previously identified brownfield site in the Parish should be substituted for both SD90 and SD91, Land North of the Forge, as it has none of their problems and it provides at least as many affordable housing units on-site.

1. In the *Pre-Submission Plan*, allocation SD90 was increased in size by 60% relative to that in the *Preferred Options* consultation. As a result, it jutted into an arable field, well behind the village-edge building lines on both New Lane and the Elsted Road; the site was therefore visually anomalous and highly obvious from the South Downs Way.
2. The allocation now appears in the *SDNPA.3 Schedule of Main Modifications* where it has reverted to its original size and shape which respects the existing building lines. The change is very much welcomed. This Position Statement therefore relates only to the modified version of SD90 (*Main Modifications* MM56-58 and Appendix 4).
3. The *Sustainability Appraisal* assessed the site as it now appears in Appendix 4 as having uncertain landscape and cultural heritage impacts. Even an ‘uncertain’ impact falls far short of the very first sentence of the SDNPA’s Vision for 2050:
“The iconic English lowland landscapes and heritage will have been conserved and **greatly** enhanced” [emphasis added].
4. In a National Park, especially noting that this *Local Plan* emphasises that it is ‘landscape-led’, allocating sites with ‘uncertain impacts’ is unacceptable and indicative of a flawed development strategy¹: the starting point for that strategy was the *Settlement Facilities Assessment*, not landscape or cultural heritage (as outlined in the Council’s Position Statement on SD25 and its 2017 consultation representation #575).
5. The frontage of the site is on New Lane: motorised use of that road is almost entirely restricted to the occupants of six properties to the south of the site. As it is only 2.4m wide and within steep banks, agricultural traffic cannot use it. The development will therefore at least double the volume of traffic on the Lane, it cannot “... protect and enhance highway safety ...” as required by SD21 (clause 1).
6. Clause 2 of SD21 goes on to say that “Development will not be permitted where it would reduce the biodiversity, landscape and amenity value and character of historic rural roads.”

¹ In the *Sustainability Appraisal*, 78% of allocations have an uncertain or negative landscape impact (see the Council’s Position Statement and 2017 representation (#583) on the *Sustainability Appraisal*).

7. New Lane is a single-track historic rural road which is well used by walkers and horse riders to get to the Downs.
 - a. A doubling of traffic will reduce the amenity value of the Lane for these non-motorised users
 - b. Development will also impact on the character of the Lane. In particular paragraph 6.29 requires that "... the integrity of banks must be maintained": this is impossible given the site is more than a metre above New Lane.
8. For non-motorised users heading for the Downs, development of the site will radically restrict their first view of the Downs. That view is of Beacon Hill, a key landmark² in the National Park. Every clause of SD6 (Safeguarding Views) emphasises conserving and enhancing views, particularly views of key landmarks, including those views from within a settlement.
9. In the Main Modification of SD90, provision has been made to "... retain glimpsed landscape views from New Lane". While better than nothing, glimpsed views relative to open ones are not an enhancement and, over time, those glimpsed views will be filled by the paraphernalia of domestic life such as cars, ornamental trees, bushes, sheds, refuse bins etc.
10. The Council is not opposed to development in Harting Parish, provided the site is appropriate. In response to the allocation SD90 (and SD91, Land North of the Forge), it proposed an alternative brownfield site (representations #576 and #578 respectively). In response to those representations, the SDNPA states "There has been no such alternative site submitted to the SDNPA whilst the Plan was being prepared"³.
11. This is not true. The alternative was proposed at a meeting requested by SDNP officers which was held on 11 April 2017 in Harting Community Hall and attended by the two officers, seven councillors and the Clerk to the Council.
12. The meeting arose as a result of representations on SD90 & 91 made by councillors at the SDNPA Planning Committee on 9 March 2017; it was ostensibly to enable the officers to bring forward and discuss alternative sites in confidence. In the event, the officers presented no alternative sites and were completely unwilling to discuss the Council's proposed brownfield site⁴ on the grounds that it is outside of South Harting, the only settlement in the Parish with a settlement boundary.
13. This refusal is contrary to SD25 (clause 2d and paragraph 7.11: appropriate reuse of a previously developed land), is contrary to the 2012 NPPF's Core Planning Principle encouraging the re-use of brownfield sites, does not align with paragraph 55 of the NPPF which has no mention of settlement boundaries and is contrary to good community involvement.

² TLL 08 *Viewshed Characterisation & Analysis, 2015*, landmark reference L6.

³ SDNPA-4 *NPA Responses by policy and site: Revised Appendix 4 of the Submission Consultation Statement*, p.330.

⁴ Builders yard & offices at Station Yard, Nyewood, GU31 5HX

14. Planning permission for the brownfield site in Nyewood has now been sought. In contrast with the large number of *Pre-Submission* objections to SD90 & 91, there have been no objections to the planning application. The site has no landscape, cultural heritage or biodiversity impacts and the application proposes five affordable homes on-site out of a total of nine (together SD90 & 91 provide a total of 3-5 affordable homes).

In summary

15. SD90, Land at Loppers Ash, has uncertain landscape and cultural heritage impacts, contrary to the first Purpose of the National Park and the SDNPA's Vision for 2050.

16. Furthermore, the allocation also conflicts with, or is not aligned with, other policies:

- SD6 (safeguarding views, particularly landmark views)
- SD21 (protecting and enhancing road safety; maintaining amenity value and character, particularly integrity of banks, of historic rural roads)
- SD25 (re-use of brownfield sites as an alternative to encroaching on undeveloped countryside)

17. The meeting with SDNP officers demonstrates that, other than for the strategic sites, brownfield re-use is not a priority for the SDNPA contrary to one of the 2012 NPPF's Core Principle and its own policy SD25 as now formulated. It also demonstrates an unwillingness to engage adequately with the body which represents the community.

18. In planning terms, especially in a National Park, the cumulative adverse and negative impacts of SD90 are substantial, as are those of SD91. The alternative brownfield site has none of their problems and it would provide at least as many affordable homes on site as SD90 & 91 together. The brownfield site should be substituted for both allocations with re-instatement of the settlement boundary at those two locations.