

# Harting Parish Council [R407]

## Position Statement: SD91 Land North of the Forge, South Harting

(2017 SD91 Consultation Comment: #578)

In this Position Statement, Harting Parish Council (hereafter 'the Council') argues that the cumulative adverse and negative impacts of site allocation SD91 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 SD91 and SD90, Land at Loppers Ash, as it has none of their problems and it provides at least as many affordable housing units on-site.

1. SD91 is the south-western part of a somewhat larger plot previously rejected in two SHLAAs, one by Chichester District Council and subsequently by the SDNPA.
2. The site is indicated as being 'available' in these SHLAAs, but the Land Registry shows that it is in two ownerships. There is no certainty that one of the owners will agree to development on their land which brings into question the viability of 5-6 dwellings on the remaining area.
3. There has been no Regulation 18 consultation<sup>1</sup> on the allocation of site SD91. Furthermore, contrary to the Gunning Principles, there was no consultation at a formative stage in the development of this policy and its implementation will deprive the community of the benefit of a gap in the built form on the Elsted Road, a benefit they expected to retain because the site had previously been rejected by the SDNPA.
4. The additional housing numbers arising from this allocation increase the overall numbers for South Harting from 6-8 to 11-14. The village therefore has a housing allocation equivalent to a spatial strategy of Dispersed-Medium-plus-60%, not Dispersed-Medium. This is the case for 50% of the settlements<sup>2</sup> in Chapter 9 of the *Plan*, despite the SDNPA stating that increased housing numbers for some settlements "... does not represent a departure from the spatial strategy"<sup>3</sup>. Targeting some communities in this way is unfair and again contrary to the Gunning Principles.
5. The *Sustainability Appraisal* assesses the site, along with many others, as having uncertain landscape and cultural heritage impacts<sup>4</sup>. A National Park Authority choosing to allocate sites with 'uncertain impacts' is unacceptable and indicative of a flawed development strategy: 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).

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<sup>1</sup> This is the case for 77% of the housing allocations in Chapter 9 of the *Plan*: see the Council's Position Statement on Community Involvement.

<sup>2</sup> Some settlements now have housing allocations well in excess of Dispersed-Medium-plus-60%.

<sup>3</sup> *TSF-07-Supply of Housing Background Paper*, para 6.7, p.11.

<sup>4</sup> 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*).

6. Commenting on the more recent of two planning applications for the site<sup>5</sup>, the SDNPA's Landscape Architect and Conservation Officer were more definitive about the impacts. These comments were referred to in the Council's 2017 representation (#578), to which the SDNPA responded<sup>6</sup> by stating "Comments made on a specific scheme or planning application are not the same as an assessment of landscape sensitivity for an appropriately designed scheme. The proposed site boundary limits the extent of development to the less sensitive part of the site<sup>7</sup>. The policy requires development to preserve and enhance the setting of the conservation area".
7. However, the Conservation Officer actually said "... I would regard the proposal site as being firmly beyond the original built confines of this peripheral point of the historic settlement .... **any development on it** would close off a significant view to open country and undermine the currently dispersed and intermittent built character on this northern side of Elsted Road. This would have some impact on the setting of the Conservation Area at this point and it is clear that harm to character would ensue" [emphasis added].
8. Further, the Landscape Architect noted that "... the existing site provides a gap in the built form along Elsted Road with positive views over the rolling field with views to an undeveloped horizon providing a positive contribution to the setting of South Harting" and went on to say that "... **any housing development on the site** will give rise to adverse landscape and visual effects" [emphasis added].
9. Both officers were making unequivocal comments about the principle of development on the site and the adverse effects that closing the gap would have on landscape, the setting of the village, the setting of the Conservation Area and views from within the village. Whilst these comments were made as a result of a particular planning application, they were not specific to that application as suggested in the SDNPA's response quoted above.
10. The allocation will therefore have adverse landscape and heritage impacts. It is thus contrary to the first and over-riding Purpose of the National Park and to the SDNPA's vision for 2050: "The iconic English lowland landscapes and heritage will have been conserved and **greatly** enhanced" [emphasis added].
11. Similarly, the allocation will have adverse effects on views and on the setting of the Conservation Area: it conflicts with SD6 on safeguarding views and with SD15 on the preservation and enhancement of Conservation Areas respectively.
12. Further development in this immediate vicinity on the Elsted Road would also have a negative cumulative impact because of a recent development on the site opposite, and hence would be contrary to the ethos of core policy SD1 (clause 3).

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<sup>5</sup> SDNP/16/05584/FUL, Land North West of Horses Knap, GU31 5LD.

<sup>6</sup> SDNPA-4 NPA Responses by policy and site: Revised Appendix 4 of the Submission Consultation Statement, p.338.

<sup>7</sup> The current allocation site is less deep than the plot in the planning application: the reduced depth was influenced by that application with the intention of reducing the impact of development on views from the wider landscape. The frontage, however, remains the same (c. 45m).

13. The proposed development extends 10m behind the adjacent Conservation Area houses to the east and west whose plots are only 15m deep. Its housing density (50-60 per hectare; site area 0.1 ha) is also out of kilter with the existing housing and is more akin to urban levels. This does not accord with paragraph 7.14 of SD25:  
“It is equally important to recognise that efficient use of land does not translate to overdevelopment of sites in the context of the surrounding area and setting. In some contexts, a more diffuse built form may be more appropriate.”  
A Conservation Area on the edge of a village is surely one such context.
14. The entrance to the site would be the fourth junction onto the Elsted Road all within a distance of 170 metres of each other. The Elsted Road in this area is now partially single lane due to parked cars as a result of the recent development opposite which was supposed to provide all parking on-site. The allocation cannot therefore “... protect and enhance highway safety ...” as required by SD21 (clause 1). Indeed, it is also likely to introduce more on-street parking.
15. The proposed development will close off the principle access to a large arable field to the north of it. This will force large, wide and powerful agricultural vehicles onto two other historic rural roads, one effectively single lane because of numerous parked cars and the other a deep, winding and narrow hollow-way. Again, this is contrary to the highway safety aspirations of SD21.
16. SD50, Sustainable Drainage Systems, requires new developments to “... ensure that there is no net increase in surface water run-off, taking account of climate change... ”. This will be a challenge given the size of the site, the number of houses it will contain and the strongly sloping topography of the site itself and of field behind. Agricultural run-off to the adjacent ecologically sensitive damp meadow and headwater stream of the River Rother would certainly not conserve and enhance their biodiversity (SD9).
17. The Council is not opposed to development in Harting Parish, provided the site is appropriate. In response to the allocation SD91 (and SD90, Land at Loppers Ash), it proposed an alternative brownfield site (2017 representations #578 and #576 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”<sup>8</sup>.
18. 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.
19. 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 site<sup>9</sup> on the grounds that it is outside of South Harting, the only settlement in the Parish with a settlement boundary.

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<sup>8</sup> SDNPA-4 NPA Responses by policy and site: Revised Appendix 4 of the Submission Consultation Statement, p.337.

<sup>9</sup> Builders yard & offices at Station Yard, Nyewood, GU31 5HX

20. 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.
21. 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**

22. SD91, Land North of the Forge, is not in single ownership and part of it may not be available.
23. There has been no Regulation 18 consultation and the Gunning Principles have not been followed.
24. SD91 has negative landscape and cultural heritage impacts (SD15) and potentially also an adverse biodiversity impact (SD9). It conflicts with the first purpose of the National Park and the SDNPA's Vision for 2050.
25. Furthermore, the allocation also conflicts with, or is not aligned with, a number of other policies:
  - SD1 (cumulative impacts of development)
  - SD6 (safeguarding views)
  - SD21 (protecting and enhancing road safety)
  - SD25 (overdevelopment of sites; re-use of brownfield sites as an alternative to encroaching on undeveloped countryside)
  - SD50 (no net increase in surface water run-off)
26. For South Harting as a whole, the addition of this last-minute allocation means that housing numbers equate to a Dispersed-Medium-plus-60% spatial strategy.
27. 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.
28. In planning terms, especially in a National Park, the cumulative adverse and negative impacts of SD91 are substantial, as are those of SD90. The alternative brownfield site has none of their problems and 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.