

**SDNPA response to the Submission version of the updated Findon NDP**

Page number	Section	Comments	SDNPA Recommendation
	General	<p>The SDNPA would firstly like to thank the neighbourhood planning group for all their hard work preparing the Findon NDP Update. As has been raised previously and set out in the SDNPA's response to the Pre-Submission FNDP Update, it is the view of the SDNPA that the allocations proposed in the revised NDP <u>do not</u> conflict with the adopted South Downs Local Plan (SDLP) allocations. Therefore both sets of the sites could be relied upon by developers to come forward for development.</p> <p>The SDNPA sought legal advice in advance of responding to the Pre-submission consultation on the FNDP Update. This legal advice was sought specifically on the matter of a potential conflict between the emerging FNDP Update and the emerging SDLP. In summary, the legal advice states that, whichever plan is made or adopted last will supersede, where relevant, the other. However, this is only the case if the allocations are viewed to be in conflict and state explicitly the intention to supersede. If all the allocations can be viewed as suitable albeit different then they could all be granted planning permission. The SDLP allocations have been found to be sound and are adopted part of the Development Plan. The proposed FNDP allocations are for different sites to those within the SDLP and are therefore not inconsistent or in conflict with the SDLP allocations. Therefore, should the FNDP allocations be found to be suitable, these will be in addition to the SDLP allocations.</p> <p>This leads to the potential situation of a significantly higher level of development coming forward in Findon than set out in the strategic policy of the SDLP. Policy SD26 sets a housing figure for Findon of 28 new homes. The FNDP Update proposes allocations for between 30-36 new homes. These would be in addition to the 24-30 homes allocated in the SDLP. Criterion 4 of Policy SD26 of the Local Plan is relevant and states:</p> <p>"Neighbourhood Development Plans that accommodate higher levels of housing than is set out above will be supported by the National Park Authority providing that they meet local housing need and are in general conformity with the strategic policies of the development plan."</p> <p>It is the opinion of the Qualifying Body that the proposed FNDP sites are alternative to the SDLP allocations, they do not therefore present a case that higher levels of housing will meet local housing need. However, it is clear that there is a high level of housing need across the National Park. Evidence of this is presented in the Housing and Economic Development Needs Assessment (HEDNA), which forms part of the evidence base for the SDLP, and identifies an objectively assessed need of 447 homes per year. Only a proportion of this need can be reasonably met whilst maintaining the purposes of the National Park. The SDNPA does not therefore, object</p>	<p>The FNDP allocations should be considered as in addition to the SDLP allocations.</p>

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		<p>in principle to a higher quantum of development in Findon as there is known to be a high level of housing need, as long as the proposals are in general conformity with the strategic policies of the development plan.</p> <p>It is noted that neither a Sustainability Appraisal nor Habitats Regulations Assessment has been carried out for the FNDP. Chapter 1 deals with SEA / HRA screening and states neither assessment was required. However, the screening pre-dates the adoption of the Local Plan and the allocation of sites in both the NDP and SDLP. It is likely that a re-screening for SEA and HRA is required as a result of the dual allocations which will deliver significantly increased quantum of housing for the village.</p> <p>The submission FNDP is presented in three parts; Part 1: Introduction, Vision &amp; Objectives, New and Amended Policies; Part 2: Background and Retained Policies from the original FNDP; Part 3: Retained Community Aspirations. Should the FNDP proceed to referendum it is strongly recommended that a single consolidated Plan is created. The current format is difficult to navigate with page numbering that does not run through all three parts and with some sections of the plan repeated (vision and objectives).</p> <p>The SDNPA's comments largely relate to the proposed spatial plan, masterplan and five site allocations. Comments are also made on the retained FNDP policies which in some instances have been modified and which should now be considered against the adopted SDLP.</p>	<p>Provide a single consolidated plan for referendum.</p>

<b>Page number</b>	<b>Section</b>	<b>Comments</b>	<b>SDNPA Recommendation</b>
Pg.8	Introduction & Background	The section on the plan preparation process has been removed from Part Two: Retained policies from the 2016 FNDP. The introduction and background explains the reasons for updating the FNDP but does not provide a full narrative on how the plan has been prepared. It would be helpful to include details such as how and when a steering group was established, membership of the steering group, subsequent engagement activity and evidence gathering – including details of any reports commissioned by the steering group and how these have informed the Plan. Some of this information is set out in the Consultation Statement, although it would be appropriate for this information to be at the beginning of the plan to allow the reader to understand the context of the updated Findon Neighbourhood Plan (FNDP)	Include details of how the Plan has been prepared.
Page 12	Para 3.8	Paragraph 3.8 incorrectly states that the SDNPA can delete the housing allocations in Findon from the Local Plan. The SDNPA adopted the Local Plan on the 2 <sup>nd</sup> July and cannot make any changes to the finalised document.	Correct paragraph text
Page 13	Para 3.11	Paragraph 3.11 states that the Legal Opinion provided to the SDNPA is ‘equivocal’. The legal advice is quite clear that a site allocation in the SDLP may not directly conflict with an alternative allocation in the NDP, and thus that both could be relied upon by developers.	Correct paragraph text
Page 14	Chapter 4	This section refers to consultation undertaken by the SDNPA in preparing the Local Plan. Full details on the Local Plan consultation are set out in the SDNPA Consultation Statement which is available in the Core Document Library. Allocation sites were not in the Preferred Options Local Plan as the QB were working on allocations. The SDNPA allocated for Findon in the Pre-Submission Local Plan on the direction of the neighbourhood plan Examiner. Evidence supporting all Local Plan allocations is also set out in the Core Document library	Correct paragraph text
Multiple		All references to the Submission version of the South Downs Local Plan should be updated to the adopted South Downs Local Plan.	Update references to the SDLP
Page 16	Vision & Objectives	<p>We would caution against the use of ambiguous terms such as ‘attractive’ within the vision. What is the character of the parish that makes it attractive? This should be clearly expressed in the vision. Similarly the reference to ‘rural character’ provides little detail on what the community values and should be protected. The core objectives refer to the ‘current character’ of the village, again clarity on what is meant by this should be provided. We would recommend that the final objective could be strengthened to state: “Conserve and enhance key views into and out of the village” – key views should be identified in the NDP or referred to in supporting document.</p> <p>Landscape character is defined in the SDLP glossary as:  “‘What makes an area unique. It can be defined as a distinct, recognisable and consistent pattern of elements, be it natural (soil, landform) and/or human (for example, settlement and development) in the landscape that makes one landscape different from another, rather than better or worse.”</p>	Provide detail on the character of the parish that is valued by the local community.

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		Currently the Vision and Objectives appear in both Part 1 and Part 2 of the submission FNDP. For ease of use and clarity, it is recommended that the consolidated referendum NDP contains just one Vision and Objectives section.	Consolidate Vision and Objectives into one section within the Plan.
Page 18	Housing and Design Quality	<p>The retained 2<sup>nd</sup> objective suggests the built up character is separate and different from the landscape character. This is incorrect as built up areas form part of the landscape character. We would recommend the objective is reworded to say:</p> <p>“Ensure new housing is integrated with, and design responds to, local and contextual landscape character.”</p> <p>The 3<sup>rd</sup> retained objective refers to ‘rural forms’. It is not clear what is meant by this. Recommend the following rewording:</p> <p>“Encourage design which is of high quality, be that either traditional or contemporary styles, but where design, architecture and materials support local character and context.”</p> <p>We would also encourage reference to landscape-led design in line with SDLP Policy SD5.</p>	Reword objectives
Pg.12	Planning Policy Context	<p>The site allocation numbers in the adopted SDLP were revised from the Pre-submission numbering. The following allocation numbers are relevant:</p> <p>SD69: Land at Elm Rise</p> <p>SD70: Soldiers Field House</p>	Update SDLP allocation references
Pg.19-21	Environment and Heritage	<p>It would be helpful to include maps of key designations within the FNDP (possibly as appendices) rather than in the Evidence Base.</p> <p>3.3.9 – Census data should be provided here to support the statement on housing mix. Details of dwelling size would also be useful here.</p>	Includes maps of environmental designations. Include census housing data.
Pg.28	Policy BT2	<p><b>Retention of Employment Land</b></p> <p>Strategic Policy SD35: Employment Land, of the SDLP protects all employment land in the National Park that is fit for purpose. Policy BT2 is in general conformity with SD35 but adds nothing further. It is recommended that the necessity of BT2 is reviewed.</p>	Review necessity of policy.
Pg.29	Policy BT4	<p><b>Retention of retail frontages</b></p> <p>There is strategic policy and development management policy in the SD Local Plan on this topic. The current policy wording appears to undermine one of the aims of the FNDP to protect local shops as the policy currently allows change of use if certain tests can be met. It is recommend the marketing requirements are increased to a minimum of 24 months in line with SDLP Policy SD37 and the aims of the FNDP.</p>	Review necessity of policy and review policy wording.

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Pg.31	BT9	<b>Communications infrastructure</b> This policy suggests general support for communications infrastructure which includes telephone masts. Appropriate caveats should be included to protect the National Park special qualities. There is a development management policy in the SDLP on this topic and reference should be made to the criteria of policy SD44 to ensure appropriate new communications infrastructure does not harm the special qualities.	Review policy wording to ensure communications infrastructure does not harm the special qualities.
Pg.37	CFW5	<b>Protection of assets of community value</b> There is a development management policy SD43 <i>New and Existing Community Facilities</i> in the SDLP on this topic. It is recommended that the criteria of section 2 of SD43 are incorporated into CFW5 to ensure appropriate protection of community facilities valued by the community in line with the aims of the FNDP.	Incorporate marketing / evidence requirements of SD43 and revise policy wording.
Pg.39	CFW6	<b>Local Green Space</b> It is questioned whether the designation of footpaths / 'twittens' as Local Green Space is appropriate. It should be clearly demonstrated that these corridors meet the NPPF criteria as demonstrably special. In addition the Planning Practice Guidance clearly states that linear corridors should not be designated as Local Green Space simply to protect Rights of Way which are already protected under other legislation	Review the designation of linear corridors including twittens and footpaths.
Pg.42	ES1	<b>Gaps between settlements (Local Gap)</b> Question the necessity of this policy. With the establishment of the settlement boundary elsewhere in the FNDP, strategic policy of the SDLP SD4 (Landscape Character) deals with gaps between settlements.  The policy refers to Map 2A, whereas the reference should be to Map 5. Also the legend of Map 5 refers to Policy ES2, the reference should be to Policy ES1.	Consider the need for the policy.  Amend map references.
Pg.40	ES3	<b>Protection of trees and hedgerows</b> There is a development management policy in the SD Local Plan on this topic. Policy ES3 is currently very generic and doesn't contain anything locally specific to Findon. Recommend that the necessity of this policy is reviewed.	Review necessity of policy or review policy wording
Pg.41	ES4	<b>Renewable Energy</b> There is development management policy in the SD Local Plan on this topic. It is recommended that criteria e) is revised in line with policy SD51 to state:  "Energy generating infrastructure is not sited on agricultural land grades 1, 2 or 3a".	Review necessity of policy and review policy wording
Pg.42	ES7	<b>Flint Walls</b> It would be helpful to compliment this policy with example photos and a map of the flint walls identified for protection. The policy could also support proposals to retain and enhance flint walls.	Support policy with photos and map of protected flint walls.

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Pg.18	HDI	<p><b>Spatial plan of the Parish</b></p> <p>The SDNPA would like to repeat and update the comments and risks identified to the Qualifying Body at the Pre-Submission consultation on the FNDP Update:</p> <p>The SDNPA actively promotes and supports community led planning, including the preparation of Neighbourhood Development Plans (NDP). The SDNPA invested considerable resources (financial and officer time) in the preparation of the current 'made' Findon Neighbourhood Plan. This plan chose not to allocate sites to meet Policy SD26 of the SDLP. The Findon NDP Examiner stated in his report that it could only proceed to referendum with several changes being made to the plan and on the understanding that the SDNPA would allocate sites for housing development in Findon in the SDLP. Therefore the SDNPA allocated two sites in Findon in the Pre-Submission version of the Local Plan namely SD71: Land at Elm Rise, Findon and SD72: Soldiers Field House, Findon. Following this, the Qualifying Body indicated that they were not supportive of the SDLP proposed allocations and would seek to update the FNDP, to include housing allocations. This decision came at a relatively late stage in the preparation of the SDLP. A member of the FNDP addressed the Planning Committee in June 2017 when it considered the draft Pre-Submission Local Plan. Members did not remove any of the Local Plan allocations from the Plan. The SDLP was submitted to the Planning Inspectorate in April 2018 and was subsequently found to be sound including the two site allocations for Findon. These are now part of the adopted SDLP.</p> <p>This presents the unusual situation whereby the updated Submission FNDP and adopted SDLP are proposing different housing allocations to meet the housing provision figure set in Policy SD26 of the SDLP. The updated FNDP asserts that the site allocations proposed by the FNDP are not in addition to those proposed by the SDNPA, but are presented as alternative housing allocations. Given that the SDLP is now adopted, the SDLP allocations form part of the Development Plan. The proposed FNDP allocations are for different sites to those within the SDLP, and are therefore not inconsistent or in conflict with the SDLP allocations. Hence they cannot be considered alternative allocations. This view is supported by the legal advice provided on the matter (legal advice is attached to this representation).</p> <p>We set out the SDNPA position in relation to the proposed site allocations below, however, it is worth highlighting the potential risk in FNDP seeking to allocate sites in addition to the SDLP allocations. The updated FNDP includes five site allocations to meet the housing provision figure set in the SDLP. These are different sites to those allocated in the adopted SDLP. There is a risk that the FNDP proposed allocations could be allocated in addition to the SDLP allocations and in turn granted planning permission for development. This would result in a much higher level of development for the settlement of Findon than that proposed as appropriate in the SDLP.</p>	The concerns of the SDNPA are addressed.

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		The SDNPA does not object in principle to a higher quantum of development in Findon than that set out in Policy SD26. Indeed criterion 4 of the Policy states that NDPs that accommodate higher levels of housing will be supported by the National Park Authority providing that they meet local housing need and are in general conformity with the strategic policies of the development plan.	
Pg.20	HD1.5	The approach set out in this paragraph does not reflect SDLP Strategic Policies SD27: Mix of Homes and SD28: Affordable Homes, which provide clear strategic requirements for tenure and housing mix. The FNDP should require that the housing mix set out in Policy SD27 is used, subject to robust local evidence of an alternative housing mix being provided at application stage. Affordable housing tenure should be sought in line with Policy SD28. The current approach risks uncertainty and a potentially weak negotiating position at the application stage.	Amend text to reflect the approach set out in strategic policies SD27 and SD28 of the SDLP
Pg.44	HD2	<b>Local Connection</b> Policy HD2 is not in line with the cascade requirements set out in the SDLP, in particular in paragraph 7.61. As set out in paragraph 7.61 provision should first be made for the needs of the village; then the parish; then the wider area including nearby settlements and parishes within the National Park. As currently worded policy HD2 will only require the local connection criteria to be applied on the first occupation of the affordable home, therefore the local connection will not remain in perpetuity.	Review policy wording.
Pg.44	HD3	<b>Live / Work units</b> It is not clear where this policy applies – within the settlement boundary or elsewhere? Caveats should be included to protect amenity and prevent against the loss of large areas of garden/green space. HD3.3 reads as policy criteria and should be included in the policy text rather than the supporting text.	Review policy wording.
Pg.21	HD9	<b>Masterplan for the south west end of Findon</b> The proposed masterplan is noted. Substantive comments are provided in relation to the allocation sites below. The SDNPA has a major in-principle concern regarding the scale and location of development envisaged by the masterplan, particularly in terms of the significant change to settlement form and extension of built form towards Worthing (Findon Valley) along the A24 corridor. The area is also on the opposite side of the A24 and is therefore largely detached from the settlement form, notwithstanding aspirations to mitigate the barrier effect of the A24. Indeed the Parish Council previously objected to the identification of these sites in the Strategic Housing Land Availability Assessment (SHLAA) as having potential for housing due to their disconnect with the village and the danger of crossing the busy road. It is also noted that elements of the masterplan are aspirational, and we would therefore question the overall deliverability of what is envisaged.  Should the individual site allocations be found to be appropriate, the SDNPA has serious concerns about the sites coming forward separately. It will not be possible to deliver a landscape-led approach consistent across all three	SDNPA raises substantial concerns with the proposed Masterplan.

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		sites as required by SDLP SD5. It is also questionable whether elements of the masterplan can be delivered should the sites come forward separately.	
Pg.21	HD9.I	This paragraph refers to the 'desirable walking distance' to the High Street but does not acknowledge the substantial barrier the dual carriageway of A24 presents for residents accessing the village.	Supporting text to acknowledge barrier of A24.
Pg. 23	HD10a	<p><b>HD10a Part of land adjoining the Garden Centre</b></p> <p>The site comprises redundant storage, agricultural building and stables. The stables are to be relocated to paddocks to the south of the site.</p> <p>This site is within the southern part of SDNPA SHLAA Site AR008, and is not considered suitable for allocation. The site is removed from the existing settlement of Findon, with the barrier of the main A24 dual carriageway being particularly problematic. At this point on the A24 the speed limit is currently 50mph. Development would not relate well to the existing settlement in terms of access to local services, and would not fit with the character of the settlement form as currently exists. The SDNPA therefore raises serious concerns with the principle of residential development at this location.</p> <p>SDNPA also makes the following comments regarding the effectiveness and deliverability of the allocation:</p> <ul style="list-style-type: none"> <li>• Allocation refers to 'Part of the land to the south of the garden centre' – this is too vague, a clear red line boundary map of site should be provided alongside the allocation. It would be more useful to show the map on page 48 alongside the allocation.</li> <li>• The requirement for native tree and hedge infilling should be locally characteristic</li> <li>• SDNPA are concerned by the proposed vehicular access being provided via the existing service road which serves the Garden Centre. By introducing residential uses and encroaching on the servicing of the Garden Centre, the commercial activity and viability of Garden Centre could be undermined.</li> <li>• We would question the deliverability of the proposed link lane between sites HD10a and HD11. Delivery is dependent on all 3 sites coming forward and it is not clear who will actually provide the link lane.</li> <li>• Similarly, it is not clear whether the proposed access to the paddocks to the south falls entirely within the site boundary of HD10a or is reliant on access from HD10b as well. We would question the deliverability of this access point. It is also of concern that the proposed access point will open up the paddocks to further development.</li> <li>• It is questioned whether the proposed masterplan minimises hard surfaces as required by the policy. In addition there may be other appropriate SUDs which deal with surface water runoff at source e.g. green roofs, rainwater harvesting &amp; swales.</li> </ul>	Address concerns raised by the SDNPA



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		<ul style="list-style-type: none"> <li>We repeat our concerns raised at the Regulation 14 Pre-submission consultation regarding section 2 of the allocation. Section 2 suggests significant uncertainty as to whether the site is or is not allocated, or the form the development would actually take.</li> <li>Section 3 refers to ecosystem services. Screening is not an ecosystem service and any planting should achieve a lot more than this.</li> <li>Paragraph 10a.6 highlights the sensitive view from the PRoW to the south of the site. In response to this the policy should require a positive enhancement to the settlement edge at this location.</li> </ul>	
Pg.24	Para 10a.1	It is not clear how the landscape evidence has informed the site capacity as a landscape-led approach would require.	Provide supporting evidence
Pg.25	Para 10a.6	Paragraph is difficult to follow and contains personal judgement and conjecture. Should be redrafted.	Reword paragraph.
Pg.26	Para 10a.9	This paragraph supports development arranged as a farm/stable. It is not clear what evidence this is based on and whether it is an appropriate form of development at this location.	Provide supporting evidence.
Pg.26	Para. 10a.10	Further clarity required on the meaning and deliverability of paragraph HD10a.10. If the garden centre were to be vacated and it came forward for development, the Local Plan policy SD25.2.d would be particularly relevant.	Provide further clarity.
Pg.27	HD10b	<p><b>Housing site allocation at the Lister Yard</b></p> <p>The site comprises vacant former paddocks and forms the southern part of SDNPA SHLAA site AR005 which is not considered suitable for allocation. The site is removed from the existing settlement of Findon, with the barrier of the main A24 dual carriageway being particularly problematic. At this point on the A24 the speed limit is currently 50mph. Development would not relate well to the existing settlement in terms of access to local services, and would not fit with the character of the settlement form as currently exists. The SDNPA therefore raises serious concerns with the principle of residential development at this location.</p> <p>SDNPA also makes the following comments regarding the effectiveness and deliverability of the allocation:</p> <ul style="list-style-type: none"> <li>A clear red line boundary map of site should be provided alongside the allocation. It would be more useful to show the map on page 49 alongside the allocation.</li> <li>Allocation should require development of 3 or 4 dwellings, there is no such thing as 'between 3 and 4'.</li> <li>SDNPA are concerned by the proposed vehicular access being provided via the existing service road which serves the Garden Centre. By introducing residential uses and encroaching on the servicing of the Garden Centre, the commercial activity and viability of Garden Centre could be undermined.</li> <li>We would question the deliverability of the proposed link lane between sites HD10a and HD11. Delivery is dependent on all 3 sites coming forward and it is not clear who will actually provide the link lane.</li> </ul>	Address concerns raised by the SDNPA

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		<ul style="list-style-type: none"> <li>The policy states planning permission will not be granted for any others uses. However, the reinstatement of the equine use, would for example, be appropriate.</li> <li>The use of landscape buffers is not supported. Landscape buffers are not a solution to poor design and should not be used to routinely screen new development where improved design which reflects local character would render this unnecessary. Where screening is necessary it should be consistent with the local landscape character in terms of hedgerow and woodland layout and pattern, as defined in relevant Landscape Character Assessments (for example the South Downs Integrated Landscape Assessment).</li> <li>The requirement for native tree and hedge landscaping should be locally characteristic</li> <li>It is questioned whether the proposed masterplan minimises hard surfaces as required by the policy. In addition there may be other appropriate SUDs which deal with surface water runoff at source e.g. green roofs, rainwater harvesting &amp; swales.</li> <li>Section 3 refers to ecosystem services. Screening is not an ecosystem service and any planting should achieve a lot more than this.</li> </ul>	
Pg.28	HD10b.1	It is not clear how the landscape evidence has informed the site capacity as a landscape-led approach would require.	Provide further information
Pg.29	HD10b.6	The assertions in this paragraph could be disputed. In addition, the text appears to suggest development at the Quadrangle is an example of characteristic rural settlement which is being sought at site HD10b.	Amend supporting text
Pg. 30	HD11	<p><b>Former allotments north of the Quadrangle</b></p> <p>The Former Allotments site (SDNPA SHLAA site AR009) is not considered suitable for allocation. The site does not relate well to the existing settlement pattern, and the main A24 dual carriageway creates a major barrier that divorces the site from the main settlement. The SHLAA landscape assessment found the site to have medium-high landscape sensitivity, and contributes to the local gap between the village and Worthing. The assessment concluded that development on the site would have a potential adverse impact on the character and appearance of the landscape. The SDNPA therefore raises serious concerns with the principle of residential development at this location.</p> <p>The SDNPA also makes the following comments regarding the effectiveness and deliverability of the allocation:</p> <ul style="list-style-type: none"> <li>A clear red line boundary map of site should be provided alongside the allocation. It would be more useful to show the map on page 50 alongside the allocation.</li> <li>The allocation should be for '8 or 9 dwellings', there is no such thing as 'between 8 and 9 dwellings'.</li> <li>Access to the site is to be from the Quadrangle. It is not clear why additional access from the linking lane serving the Garden Centre is also required or why all 3 sites (10a, 10b &amp; 11) cannot be accessed via the Quadrangle.</li> </ul>	Address concerns raised by the SDNPA

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		<ul style="list-style-type: none"> <li>The provision of allotments is supported however their location needs to be carefully considered. The proposed location next to the A24 raises concerns for allotment users and the risk of pollution to produce.</li> <li>A new footpath is proposed to link this site with the existing footpath alongside the A24. Will the new footpath be adopted by the Highways Authority or privately maintained?</li> <li>Rather than seeking a buffer between the proposal and existing gardens to the south of the site, the development should integrate with the existing neighbouring residential area.</li> <li>Currently the trees along the A24 boundary are providing positive ecosystem services, these should be acknowledged, protected and enhanced. There is also scope to improve ecosystem services in regards to groundwater quality.</li> <li>The requirement for native tree and hedge landscaping should be locally characteristic</li> <li>Criteria j) requires use of permeable surfaces, there may be other appropriate SUDs which deal with surface water runoff at source e.g. green roofs, rainwater harvesting &amp; swales</li> </ul>	
Pg.31	HD11.1	It is not clear how the landscape evidence has informed the site capacity as a landscape-led approach would require.	Provide further information
Pg.31	HD11.2	It is not clear why reference here to the tithe map is relevant.	
Pg.33	HD11.11	In line with the landscape-led approach, an ecological survey should inform the earliest stages of design development.	Require ecological survey to be undertaken at pre-application stage.
Pg. 35	HD12	<p><b>Housing allocation on land north of Nightingales</b></p> <p>The land north of Nightingales is not considered suitable for allocation. There are potential significant issues of poor amenity for future occupiers, due to the site's close proximity to the heavily trafficked A24 (a 50mph speed limit is in operation at this point). Given the small size of the site, it is considered unlikely that issue of noise can be successfully mitigated. There is also potential for negative impact on the landscape, as the built form of the settlement would be extended out beyond its current natural boundary at this point.</p> <p>Policy HD12 indicates that a successful development would rely on undergrounding of overhead power cables, new vehicle access and parking, proposals to mitigate the effects of traffic noise and a higher than 50% proportion of affordable housing, all of which represents a potentially significant constraint to delivery. If the issues highlighted (and potentially others) can be mitigated, it is considered that the site may have scope to come forward as a rural exception site, given it is a greenfield site outside the existing settlement boundary.</p>	Address the concerns raised by the SDNPA.

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		<p>The SDNPA also makes the following comments regarding the effectiveness and deliverability of the site allocation:</p> <ul style="list-style-type: none"> <li>• It is not clear what is meant by ‘Demonstrate that the formation level of housing and roads...’</li> <li>• Criteria a) refers to the characteristic patterns of surface water runoff and emergence of ground water. These are elements of the landscape character which should inform a landscape-led approach.</li> <li>• It is uncertain whether the proposals to prevent on street parking can be secured through the development, for example there is no guarantee an application for a TRO will be successful.</li> <li>• The potential loss of existing trees on Nightingales is of concern given their amenity and habitat value.</li> </ul>	
Pg.38	HD13	<p><b>Housing allocation on the former fire station site</b></p> <p>The former Fire Station is a site of 0.1 hectares within the settlement boundary, which is currently in use as an ambulance servicing workshop. The potential loss of an existing employment use at this site is a concern. The site is within the settlement boundary, hence any future residential development on this site would be acceptable in principle although it is considered that the small site area and existing constraints would make a proposal for 3-4 dwellings difficult to achieve.</p> <p>In addition, it is not clear why a ‘converted farm yard’ or ‘stable complex’ approach would be appropriate at this location. The site is within the residential fabric of Findon and a proposal here should respond to the surrounding context or the existing character of the site.</p>	Consider the deletion of Policy HD13, allowing the site to come forward as Windfall development in the future
41	HD14	<p><b>Extension of Settlement Boundary</b></p> <p>The SDNPA has in-principle concerns regarding the allocation sites proposed in the FUNDP. In addition, the proposed settlement boundary is not in conformity with the adopted SDLP settlement boundary which includes the Local Plan allocation sites. It follows that the SDNPA does not support the settlement boundary proposed in Policy HD14 and shown on Map 5.</p>	Consider the deletion of Policy HD14
Pg. 55	Appendix 4	It would assist the reader if there was a map showing the location of the flint walls to allow applicants / decision makers to clearly see where Policy ES7 should be applied	Provide map to assist the reader in applying Policy ES7
Pg. 63	Appendix 5	Reference to policy HD8 is incorrect, the reference should be to HD7	Amend wording