



THE
MIDHURST
SOCIETY

Registered Charity No. 268565

SDNP : Local Plan – Pre-submission Comments from The Midhurst Society

The Pre-submission document represents an impressive amount of research and analysis and its authors and collaborators are to be commended on a well-constructed and visionary plan. We at The Midhurst Society are in agreement with the aims of the Plan: to manage a dispersed medium level of growth through development whilst conserving and enhancing the natural beauty, wildlife and cultural heritage of the area.

On such a long and detailed document comments from this small voluntary organisation are of necessity broad in general, and specific only so far as relates to Midhurst and its immediate locale. In response to the specific questions posed on Page vi:

• Has the Plan been positively prepared?

Although the general tenor of The Plan is positive, there are instances where specific passages could be more positive. Some examples are set out at the end of this document.

• Is the Plan justified?

The special landscape and cultural qualities associated with The National Park are deserving of protection for future generations and a plan that delivers appropriate, effective and sensitive protection is fully justified.

Is the Plan effective? General:

Whilst The Plan provides a useful framework for the submission and consideration of planning applications we consider that it does not go far enough in setting out a vision for the future and identifying the means by which this vision can be achieved. In particular:

1. **Vision:** The vision for 2050 (as laid out in the CIL Infrastructure Delivery Plan) is this:
“The iconic English lowland landscapes and heritage will have been conserved and greatly enhanced. These inspirational and distinctive places, where people live, work, farm and relax, are adapting well to the impacts of climate change and other pressures.”
In 2017 many areas are not adapting well to the pressures exerted by modern lifestyles. For this vision to become a reality the Local Plan needs to be much more visionary. It needs to be proactive in identifying current problem areas and possible solutions and where such solutions cover more than one planning authority the SDNPA needs to coordinate actions

required to resolve the problems.

2. **Infrastructure:** New housing and commercial developments are to be permitted in defined settlement areas but infrastructure is already over-stretched in some of these settlements. The Plan should identify these problem areas and reject all further planning applications until such problems have been resolved.
3. **Infrastructure:** The CIL Infrastructure Delivery Plan identifies a net funding deficit of £54m and seeks to cover this deficit in achieving its strategic infrastructure priorities by the introduction of a Community Infrastructure Levy (ref: Chapter 1.20, Page 7). Until CIL charges have been collected over the first few years of The Plan it is too early to say that this will be effective. Alternative means of funding should be explored should the need arise to supplement CIL charges. The most obvious sources of additional funds include commercial sponsorship and an increase in Council charges already levied on residents and visitors, or the identification of new charges.
4. **Infrastructure:** Chapter 7.219 declares a presumption against major infrastructure development (Page 171). This negative declaration is totally inappropriate if the proposal seeks to remedy a long-standing issue that has been and is detrimental to the residents and users of the National Park. An example would be a proposal to ease the flow of traffic in and through Midhurst.
5. **Infrastructure:** As urban areas within The Plan increase so too do the demands made on existing sewage pipes and treatment centres. Chapter 5.158 refers in passing to 'adequate capacity of foul drainage (Page 91) but does not go far enough. The Plan should state the current usage and capacity of sewage treatment in market towns. Similarly, it should indicate usage and capacity of other major services such as schools, hospitals, health centres, emergency services, parking provisions, telephone lines and internet availability. It should be a requirement that any developer must demonstrate the adequacy of existing infrastructure or make provision for additional infrastructure.
6. **Housing:** Chapter 3.122 quantifies the number of new housing units required at 8,493 (Page 37) but identifies sites capable of providing for only 4,750. This might demonstrate The Plan's commitment to protecting the landscape but it does not offer an effective solution for the people living, working and raising families in the SDNP.
7. **Climate Change:** The effects of climate change have the potential for drastic impact on the very landscape The Plan seeks to protect. Whilst the response has to be global, the SDNPA should be seen to be playing its part by permitting the development of some renewable energy projects. SD51 is generally supportive of very small projects (Page 193) but The Plan as a whole does not reflect this in its wording. The Plan could be more proactive in encouraging appropriate developments of renewable energy projects. Indeed, the first trigger for alerting the SDNPA that not enough is being done (Page 423) is not scheduled until the year 2023.
8. **Climate Change:** In the description of sustainable house design (Chapter 5.29) the only reference to renewable energy is with regard to wood fuel. However, whereas clean energy production is positive in reducing greenhouse gas emissions wood fuel is, at best, carbon-neutral. When harvesting and transporting are taken into account it is not even that. Burning wood adds to pollution in urban areas, to such an extent that a ban is now being considered in some cities. The climate, and fuel poverty, would be better aided by, for example, roof-top solar panels.

9. **Air Quality:** New development proposals are required to consider their impact on air quality (Chapter 7.325, Page 199) but in some areas air quality is already unacceptable. The SDNPA should be more proactive in identifying such areas (eg Rumbolds Hill and North Street in Midhurst). An Air Quality Action Plan has been produced for Lewes (Chapter 7.327, Page 199). Similar AQAPs could be appropriate for other areas. More tree planting should be part of the vision for towns. In particular, it has been found that roadside shrubs can be more effective than trees at reducing air pollution within two metres of ground level where pedestrians and cyclists are breathing. Towns and cities throughout the UK have been introducing 20mph zones in residential areas, thus contributing to improvements in road safety and pollution, but this does not appear to be part of the vision for the SDNP.
10. **Cycle paths:** Strategic Policy SD20 supports development proposals that contribute to a network of non-motorised travel routes (Page 83) but the existing network is inadequate and this policy will not of itself create such a network. Certain routes with the potential of becoming cycle routes are protected from adverse and conflicting development, but The Plan needs to be more proactive in bringing about the construction of the desired network. A piecemeal approach will not be effective and the SDNPA should take a leading coordinating role and establish an action plan and time-table. There is no target set for SD14 (Page 380) and therefore no trigger to indicate that not enough is being done. The SDNPA should commit to a Local Cycling and Walking Infrastructure Plan as specified by the Department of Transport in their Technical Guidance for Local Authorities publication released in April 2017.
11. **Cycle paths:** Strategic Policy SD20 supports proposals for developments that reduce the severance effect of major roads and railways (Page 83) but the SDNPA cannot wait indefinitely for such proposals as might be submitted and needs to be more proactive in improving non-motorised travel routes in this way. There is no target set for SD14 (Page 380) and therefore no trigger to indicate that not enough is being done.
12. **Development Buffer Zones:** Chapter 5.108 sets a minimum buffer of 15 metres between developments and ancient woodlands or veteran trees (Page 78) which appears to be totally inadequate considering that some native trees grow to a height of 40 metres.
13. **Development Buffer Zones:** Chapter 5.153 sets a minimum buffer of 8 metres between developments and water corridors (Page 90). This is the equivalent to the length of a small boat and appears to be totally inadequate. As climate change continues to add to the likelihood of an increase in the frequency and intensity of storms, developments anywhere near 'at risk' flood areas must be banned completely

Is the Plan effective? Midhurst and Area:

Whilst The Plan provides a useful framework for the submission and consideration of planning applications we consider that it does not go far enough in setting out a vision for the future. In particular:

1. Strategic Policy SD26 allocates 50 houses to Easebourne and 175 to Midhurst (Page 122). Whilst these numbers may be desirable in the wider context of the Local Plan concerns must be raised at the impact on the infrastructure. In particular, the major route joining Easebourne and Midhurst is the combined east/west A272 and the north/south A286 which is already heavily congested. Traffic is frequently at a standstill between the two mini roundabouts at either end of North Street and Rumbolds Hill, with serious

consequences for air quality. Any such development should be put on hold until traffic easing measures have been implemented.

2. Allocation Policy SD67 identifies land at Cowdray Works Yard, Easebourne for mixed commercial (A1/A3/B1) and residential development (Page 253), with access from the A272 (Easebourne Lane). This would put added strain on the already congested and polluted (and sometimes gridlocked) road leading south to and through Midhurst. Any such development should be put on hold until traffic easing measures have been implemented. If this becomes a mixed development site it should be ensured that any industrial processes that are covered by B1 use do not cause excessive noise, vibrations or pollution that would compromise the quiet enjoyment of the occupants of the residential units.
3. Allocation Policy SD68 identifies land at Egmont Road, Easebourne for residential development (Page 256). However, access is from Dodsley Lane (A286) or Easebourne Lane (A272), both of which suffer from pollution and are heavily congested (sometimes gridlocked) in a southerly direction towards the mini roundabout and pinch-point at North Mill Bridge, Midhurst. Any such development should be put on hold until traffic easing measures have been implemented.
4. Allocation Policy SD69 identifies land at the former Easebourne School, Easebourne for residential development (Page 260). However, access is from Easebourne Street which leads into Easebourne Lane (A272) which is already polluted and heavily congested (sometimes gridlocked) in a southerly direction towards the mini roundabout and pinch-point at North Mill Bridge, Midhurst. Any such development should be put on hold until traffic easing measures have been implemented.
5. Strategic Allocation Policy SD81 brings together the WSCC depot and former brickworks site off Bepton Road in Midhurst (Pages 302/303) thus creating a significant portion of land for potential development. It is important that the recycling centre is re-sited to a location with good accessibility for Midhurst residents, but a well-designed residential development would enhance this rather ugly site. It also provides an opportunity to create a more effective buffer zone protecting Midhurst Common. However, consideration could be given to increasing this potential still further by the (compulsory?) acquisition of the land accommodating the low-grade commercial units in Station Road. Perhaps there is a case to be made that affordable housing should be more than the advisory minimum allocation.
6. Strategic Allocation Policy SD82 covers a significant parcel of land at Holmbush, Midhurst, previously used as a caravan park (Page 308). This is a site that has remained derelict for far too long and a well-designed residential development would be welcome providing that wildlife is sensitively re-located. Perhaps there is a case to be made that affordable housing should be more than the advisory minimum allocation. However, the Concept Plan (Page 310) appears to show the site entrance from The Fairway on a blind bend where traffic flow is already impeded by street parking. Chapter 9.164 calls for a transport assessment (Page 297). A full traffic impact assessment is also required, not just for the flow of traffic into and around this site but also to ensure safe access to and from New Road.
7. Allocation Policy SD83 calls for residential development on a small site currently used as a car park off The Fairway, Midhurst (Page 312). This section of The Fairway, which is already

much used (including by buses operating Route 60 running between Midhurst and Chichester) is narrow and attracts street parking which then presents a hazard to passing traffic. In addition, the site is opposite the proposed site entrance for the Holmbush Caravan Site Development and the removal of this car park would add to the congestion and confusion already experienced here. The removal of existing car parking facilities should be resisted.

8. Allocation Policy SD84 covers 0.4 hectares of brownfield/derelict land in Lamberts Lane, Midhurst (Page 315). The Plan draws attention to the physical constraints regarding vehicular access at both ends of Lamberts Lane where traffic in North Street (already heavy) often has to stop to allow vehicles to leave and enter. This is a serious concern, and will add to the cumulative effect when coupled with other recent and proposed residential developments in Lamberts Lane. Lamberts Lane itself has unrestricted parking which then impedes passing vehicles, and such are the pressures on parking that some vehicles have recently started using the grass verge which is now showing signs of damage. Traffic and parking issues must be resolved before more residential units are permitted. An alternative use, for a small park or arboretum, would provide a useful leisure amenity for residents of northern Midhurst for whom the South Pond is too far to walk.
9. The area to the north-west of the site at Lamberts Lane is known as Whip Hill. In recent years the public footpath from Lamberts Lane to Whip Hill was closed to make way for school playing fields. The land currently being considered under Allocation Policy SD84 (Page 315) presents an opportunity to reinstate a non-motorised route west to join the footpath from June Lane and onward to Whip Hill and no development proposal should be accepted that does not contain this facility.
10. Allocation Policy SD85 covers a small area of land at Park Crescent, Midhurst (Page 317). Although of necessity any residential development would be restricted to a small number of additional housing units it would nevertheless increase pressure on vehicular access to and from North Street via Lamberts Lane. The comments made in points 8 and 9 above also apply here.
11. Allocation Policy SD92 identifies the site known as Stedham Sawmill, Stedham and provides for mixed use development comprising residential (Class C3) and employment buildings (Class B1 business use) (Page 340). It should be ensured that any industrial processes that are covered by B1 use do not cause excessive noise, vibrations or pollution that would compromise the quiet enjoyment of the occupants of the residential units.
12. Chapter 9.220 indicates that the western portion of the Stedham Sawmill site is suitable for B1 units and the eastern portion for a residential scheme. It might be more appropriate to site the residential scheme to the north of the site, further away from the noise and air pollution of the A272 and nearer to the existing residential area of Stedham village.
13. Section 7g sets out the retailing profile of settlement towns against which all future developments must be measured (Page 155) but no developments can be considered for Midhurst without reference to the very specific traffic problem presented by the passage of east/west and north/south traffic through and between the pinch points of Rumbolds Hill and North Mill Bridge. Without resolving this problem it is difficult to see how 1,200 sqm of new convenience goods floorspace can be contemplated (Page 157).

14. The Plan offers a vision for the future, and should not necessarily be constrained by decisions or ideas from previous planning regimes. For example, Chapter 7.164 (Page 156) and Chapter 7.168 (Page 157) identify the area adjacent to The Grange Centre, Midhurst as suitable for a medium-sized supermarket. However, the only access is from Bepton Road which at times already has standing traffic. It is acknowledged that there is a need for affordable housing units for young people but in view of its proximity to the town's facilities this site might be more suited to retirement units.

15. The old Frazer-Nash site in Bepton Road, Midhurst (not mentioned in The Plan?) has been derelict for several years without finding a commercial use. It is acknowledged that there is a need for affordable housing units for young people but in view of its proximity to the town's facilities this site might be more suited to retirement housing. and perhaps would be more suited to retirement units.

16. The location of a new medium-sized supermarket in Midhurst should be re-examined. It could be that the Brickworks site (Pages 302/303) or the Caravan site (Page 308) might be more suited to retailing, leaving The Grange site (Page 164) free for retirement housing. The Caravan Site could accommodate a supermarket over a ground-floor car park. In view of the topography of the site the height would not be visually intrusive, and if occasional flooding occurred as a result of the high water table the car park would not sustain serious damage.

• **Is the Plan consistent with national policy?**

The Midhurst Society does not have the manpower or expertise to comment on this.

• **Has the plan met legal and procedural requirements?**

The Midhurst Society does not have the manpower or expertise to comment on this.

• **Has the Plan been positively prepared?**

Here are some examples of ways in which The Plan could reflect more positivity.

1. **Health:** The purposes and duty of the National Park include a reference to the economic and social well-being of the local communities (Chapter 1.10, Page 2, and Chapter 4.6, Page 40). This is an ambiguous definition and specific reference should be made to health, thus ensuring that due regard is paid to issues such as emissions from traffic, industrial processing and farming.

2. **Infrastructure:** Strategic Policy SD25 supports developments within settlements that meet specified criteria (Page 116) but no mention is made of infrastructure. Proposed developments within settlements should demonstrate either:
 - (a) that current infrastructure has the capacity to cope with the extra demands placed on it by such development; or
 - (b) the proposal contains appropriate measures to enhance the infrastructure.

3. **Infrastructure:** Development Management Policy SD37 refers to the circumstances under which developments in town and village centres will be permitted (Page 158) without reference to the adequacy or otherwise of existing infrastructure.

4. **Cycle routes:** Strategic Policy SD19 (Page 96) is too specific in supporting improvements to

the quality of cycle parking at railway stations and key bus stops; such improvements should be encouraged and supported wherever cycle journeys are likely to end (e.g. shops and banks).

5. **Housing:** Strategic Policy SD27 specifies the ideal mix of housing based on the number of bedrooms (Chapter 7.34, Page 127). However, recognition should be made of the different demographics of the various settlements, and those with a higher proportion of retired couples and singletons should have a higher proportion of one and two bedroom dwellings.
6. **Sustainability:** There is a presumption in favour of sustainable development (Chapter 4.4, Page 40) but the plan misses an opportunity to go further. New developments should not merely be sustainable; they could make a positive contribution to the generation of clean energy. 'Zero Carbon' is an aim (Chapter 4.28, Page 49) but a generating surplus of clean energy would be a more positive and ambitious target.
7. **Sustainability:** Development Management Policy SD30 defines the circumstances under which replacement dwellings will be permitted (Page 136). An additional criterion should be applied namely that the replacement dwelling must have a smaller carbon footprint than the existing dwelling.
8. **Sustainability:** Development Management Policy SD31 defines the circumstances under which extensions to existing dwellings will be permitted (Page 137). An additional criterion should be applied namely that any extension must not increase the carbon footprint of the existing dwelling.
9. **Sustainability:** Development Management Policy SD32 defines the criteria for permitting the development of new and temporary dwellings for agricultural and forestry workers (Page 139). An additional criterion should be applied namely that such permanent or temporary dwellings must be constructed according to best sustainable and environmental practice.
10. **Sustainability:** Chapter 4.4 (Page 40) should also include the provision of green waste collection and/or composting facilities on new developments comprising of more than five residential units.
11. **Sustainability:** It is imperative that water resources are managed efficiently (Chapter 7.282, Page 189) but no mention is made of the collection and use of rain water and domestic grey water (e.g. for the flushing of toilets; in commercial car washing processes). Proposals for new developments should have to justify the absence of any such facilities.
12. **Sustainability:** 'Sustainable Water' is an aim (Chapter 4.28, Page 49) but no mention is made of 'fracking'. The extraction of fossil fuels (which contribute to climate change) by this method uses high volumes of water and potentially leaves contaminants behind. There is an opportunity for The Plan to state categorically that this process will not be permitted.
13. **Renewable Energy:** Ecosystem services are defined as coming from our natural capital (Chapter 1.14, Page 4, and Chapter 4.12, Page 41). Although the list in this paragraph does not attempt to be exhaustive, it would be helpful to refer specifically to wind and sun. SD51 (Page 193) is generally supportive but the opportunity should be taken to reflect this support throughout The Plan. Climate change poses a threat to the flora and fauna of The Park and The Plan should embrace the possibility of wind and sun playing a part in mitigating against irreparable damage for future generations.

14. **Renewable Energy:** Strategic Policy SD34 sets out the criteria by which local business development will be permitted (Page 148) but paragraph (b) and Chapter 7.133 (Page 149) could be expanded to include specific reference to renewable energy projects that make a positive impact on climate change. As noted already biomass is, at best, neutral.
15. **Renewable Energy:** Chapters 7.306 and 7.307 (Page 194) are unnecessarily negative to neutral about the installation of ground-mounted solar arrays and no mention is made of roof-mounted solar panels. The Plan should encourage the use of small-scale solar arrays on pitched roofs and medium-scaled arrays on flat roofs of commercial, public and school buildings.
16. **Renewable Energy:** If the SDNPA is serious in 'leading the way in adapting to and mitigating climate change (Chapter 7.268, Page 186) it seems unduly negative to seek to constrain development of renewable energy (Chapter 7.272, Page 187). The very landscape that The Plan seeks to protect is at risk from climate change. Rooftop solar panels might be entirely consistent with the main aims of The Plan; small-scale hydro electricity schemes might be entirely appropriate (for example at North Mill Bridge, Midhurst); clusters of small wind turbines on farms might be no more intrusive in the landscape than grain silos.
17. **Renewable Energy:** Combined heat and power networks are dismissed out of hand except for the larger settlements (Chapter 7.310, Page 195) but there is no reason why community heating systems should not be permitted and encouraged for all proposed multi-unit residential developments.
18. **Renewable Energy:** Deep geothermal power generation is dismissed because the SDNP has not been identified as having potential (Chapter 7.311, Page 195) but there is no reason why ground-source heat pumps should not be permitted and encouraged.

The Midhurst Society submits these comments for your consideration.

On behalf of The Committee
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