

STEDHAM WITH IPING PARISH COUNCIL

Chairman: Lucy Petrie

Clerk: Jane Crawford

email: clerk@stedhamwithiping-pc.gov.uk

website: <http://www.stedhamwithiping-pc.gov.uk/>

South Downs Local Plan Pre-submission consultation – Site SD92, Stedham Sawmill, Stedham

Stedham with Iping Parish Council would like to thank the SDNPA for their excellent work in producing the pre-submission Local Plan and is pleased to support the proposed policies as they relate to our Parish. However, we believe that the proposal for the former Sawmills site is flawed for the following reasons.

Further to our letter of 8th January 2017 (*Appendix 1*), where we expressed our deep concerns about the selection of the Stedham Sawmill site for residential development, we wish to lodge our continued objection on the proposed scheme. As the local plan is landscape capacity, not housing allocation led, any unsatisfactory site should be removed if found unsound – we request that Stedham Sawmill site be removed from the SDLP and a revised scheme be addressed as part of the Stedham with Iping Neighbourhood plan that is currently in an advanced stage of preparation.

1. Has the Plan been positively prepared? No

1.1. The methodology of the Settlement Facilities Assessment 2015 is flawed as it scores Stedham public transport the same as for Midhurst and Petersfield. The criteria are based on travel time of 16-30 mins, but does not address frequency, destination or the timing of the first/last bus. The Stedham bus service is particularly poor for commuting and is essentially impractical. This is also in conflict with NPPF paragraphs 29 and 30 that promote sustainable transport.

- Bus service to Midhurst/Petersfield poor, particularly for employment. Only 7/8 buses per day and not suitable for getting to work in Chichester, Portsmouth or London as first bus east is at 07.44 and west at 8.02. Last bus to Stedham from Petersfield is 18.10 and from Midhurst 17.40.
- The Stedham questionnaire (8/2017) shows that 66% of current employment is greater than 5 miles away.
- Evidence from the village shows that this results in multiple cars per household to support commuting, typically one for each worker. Hamilton Close in Stedham for example has 10 dwellings with 40 cars.

2. Is the plan justified? No

2.1. The SHLAA initially rejected the site in 2014 but it was then included without new evidence being provided to justify the change. Indeed, some false assumptions were claimed:

- SHLAA 2014 – Appendix D(iv) Site Assessment by Area Chichester (*Appendix 2*) - originally rejected the Sawmill site stating that, “Development on the site would have a potential adverse impact on the character and appearance of the landscape. Loss of employment land.”

- SHLAA landscape assessment Dec 2016 (*Appendix 3*) changes the Assessment Recommendation to one of 'Has Potential'. Crucially, the landscape assessment now justifies ongoing concerns about the site having "Medium High Sensitivity due to its important and sensitive location adjacent to *Iping* (sic) common and limited connectivity to the settlement" by false statements that "However, the site is PDL and offers potential for heathland regeneration." This is incorrect as only half the site is previously developed land (PDL) and there is no potential for heathland regeneration given that the scheme occupies the full site.
- It is noted that the SHLAA excludes "any site, which is not considered to be previously developed land, will be excluded from the assessment if it is outside a settlement and is detached and unrelated to that settlement."
- SHLAA Erratum May 2017 includes no mention of Stedham, i.e. no correction of PDL.
- SDNPA local plan Chapter 9, para 9.218 (*Appendix 5*) – only mentions commercial storage, no mention of existing joinery and scaffolding business
- Sustainability Appraisal Appendix E: Appraisal sheets (*Appendix 7*), site allocation policies September 2017 for pre-submission consultation then gives a 'likely positive' rating for the landscape impact and an overall positive summary. The earlier incorrect statement about PDL was however changed to 'half the site is PDL', albeit too late for decision purposes.
- A full critique with our comments of the revised Sustainability Appraisal 2017 for SD92 is included below (*Appendix 4*). In summary, our view is that:

Heading	SDNPA Appraisal 2017	SIPC Assessment
Landscape assessment	Likely positive	Likely adverse
Biodiversity	Uncertain	Likely adverse
Cultural heritage	Uncertain	Likely adverse
Health & wellbeing	Neutral	Likely adverse
Vitality	Likely positive	Likely adverse
Accessibility	Likely positive	Likely adverse
Sustainable transport	Uncertain	Likely adverse
Housing	Likely positive	Neutral
Local economy	Likely positive	Likely adverse

2.2. There has been a lack of proper consultation on this site in accordance with Regulation 18 Town and Country Planning (Local Planning) (England) Regulations 2012. The current consultation is only on the matter of 'soundness' and legal/procedural compliance under Regulation 19.

- Stedham with Iping Parish Council (SIPC) were made aware of proposed change of settlement boundary to incorporate the Sawmill Site in October 2015 but this information was under embargo until December 2016 when the site maps were issued. SIPC then wrote in January 2017 to object. This objection possibly resulted in the change made in the SDLP which was put before the SDNPA planning committee on 9 March 2017, from 100% residential with 30 dwellings, to a mixed scheme to retain the net B1 use class and now with 18 dwellings.

- The wider issues raised were not reflected in the submission. It is noted that for responses of parish councils to be official (i.e. they must be officially considered by the authorities rather than just noted) the decisions of parish councils must be made at a meeting at which the public can be present. The embargo denied this. See *Appendix 10* for full history of communications. It is also noted that the consultation on this site has not complied with the 'Gunning Principles', in particular that the timing did not allow proper input at the formative stage.
 - Evidence was requested from the SDNPA on 4th November 2017 on why the landscape assessment was changed from being 'not suitable' in 2014 to one that is 'likely positive' in 2017. No formal response has been received. In a meeting with the SDNPA on 16th November 2017, an SDNPA officer stated that it was to do with the Employment Land Review and no statement was made on why the landscape assessment changed.
- 2.3. The SDNPA Employment Land Review was updated in 2017 without a publishing date or consultation and critically it changed the recommendation for the Stedham Sawmill site from the original 2015 ELR of "Continued employment use should be supported' to one 'Consider alternative uses'. The 2017 update contains a major error in not stating that a major expansion light industrial' employment use had been approved for planning in 2016 on the western half of the site.
- 2.4. The expansion of residential development in Stedham towards the A272 does not relate to the traditional settlement pattern for Stedham of a village centred around the River Rother. It would have the look and feel of "creeping urbanization" from Midhurst. This is in conflict with SDNPA Special Quality SQ7 for Distinctive settlement (distinctive towns and villages, and communities with real pride in their area), NPPF paragraph 69 that promotes healthy communities and NPPF 126 for the conservation and enjoyment of the historic environment. It is also contrary to paragraph 5.16 in the SDLP that addresses individual identity of settlements.
- SHLAA recognises that the site has 'limited connectivity with the village'.
 - Our comments on the SHLAA Landscape Assessment (stage 2)
 - *Does the site relate to the settlement pattern in terms of location and scale?* No
 - *What features comprise the settlement edge?* There is Stedham Common SSSI just across the A272 to the south, common land to the west, and fields to the east. It is remote from the centre of village with poor access. The Chichester District Council plan said that there should be no development south of the hedge to Fry's Farmhouse which defined entrance to the village.
 - *How does the site relate to these features?* No synergy. Would become a ribbon development ("creeping urbanisation") from Midhurst along A272 rather than part of a distinct village of Stedham centred on the Rother
 - *What are the qualities of these features? Are they weak or strong?* ○ *Are there opportunities to improve the settlement edge through new development?* Improve the existing B1 usage; particularly the box storage units. Some small scale residential development to the north of the site is being considered in the Stedham with Iping Neighbourhood Plan.
 - The creation of a new area of settlement on the Sawmill site that is somewhat disconnected to the rest of the village will not enhance the feeling of integration as a whole, something that the community feel strongly about based on previous experience when Common View was built without proper attention to integration.

- The change to the settlement boundary from CDC 1999 local plan (*Appendix 6*) to incorporate the Sawmill site is not supported, nor approved until new Local Plan is adopted. It creates the appearance of an ‘appendage’ that does not relate the existing settlement and will set a dangerous precedent for future expansion along the A272.
- We strongly disagree with the statement in the Sustainability Appraisal Sept 2017 that says, “*the site is previously developed and its redevelopment will serve to conserve and enhance the gateway into the village from the A272*”. The ‘gateway’ to Stedham is The Street. This site is a ‘dead-end’.

Stedham	6	18	or 3-6 dwellings which is not a significant departure from the preferred options. The current figure is based on estimated capacity of Stedham Saw Mill site, which is expected to come forward as a mixed use development. Stedham scores 5.5 in the SFS, indicating that it is well-placed to support a modest amount of housing development. The site is previously developed and its redevelopment will serve to conserve and enhance the gateway into the village from the A272.
Stour	11	28	The village is 1.5 miles from the town of

- 2.5. The proposal for 16-20 dwellings is considerably more than 5 x 1 bed and 1 x 2 bed currently in the local housing register – ref CDC Housing Information 7/2017
- 2.6. Housing density of 20 buildings on east of site (approx. 0.5 - 0.6 Ha) equates to 33 - 50 dwellings/Ha (above threshold for CDC of 30/Ha). This is too dense! and we ask what policy is being used by SDNPA in this respect.?

3. Is the plan effective? No

- 3.1. With reference to SDLP development management policy SD11, the minimum buffer of 15m from the mature trees that follow the boundary with the common land on the western side of the site has not been addressed. This will have a material impact on the usable area of the site as well as issues with overshadowing. See planning application SDNP/16/03850/OUT for more details of tree constraints.
- 3.2. There is no mention of the Saxon shrine found near the site’s access to A272 and the potential impact from archaeological work done on site. See *Appendix 9*.
- 3.3. Combining B1 commercial and residential on a small site in a rural environment risks creating problems from noise, traffic etc and other impacts in the future for the proposed residents.

4. Is the plan consistent with national policy? No

- 4.1. The proposed scheme will result in the loss of current employment on the existing eastern half of the site and the loss of employment opportunity on western half based on the B1 planning permission already obtained but never executed. The proposal to close the existing employment conflicts with para 28 of the NPPF that seeks to “support the sustainable growth and expansion of all types of business and enterprise in rural areas”. It is also in conflict with SDLP objective 9: to protect and provide for local businesses, objective 8 that supports local jobs, and Policy SD35 that states that; “*The Authority will safeguard all existing employment sites and allocations that are fit for purpose from development proposals for non-employment uses.*” Indeed, the SDNPA Employment Land Review

September 2015 gave the recommendation for the Stedham Sawmill site that; “This is a single user site which supports one of the key sectors identified in the Partnership Management Plan. The land allocated in the Chichester District Local Plan now benefits from planning permission and can therefore be regarded as a commitment. Continued employment use should be supported.” See Appendix 11.

- The eastern half of the site has been historic use for employment since circa 1800. It is clearly shown on OS map from 1874 (*Appendix 8*). It currently comprises a range of businesses including a joinery shop, scaffolding business and storage. There are some 13 people involved full/part-time on the site. Virtually all of these businesses will be lost to the site as being not suitable for relocation to the western half.
 - Western half of site has outline planning permission approved 30/3/2017 for 2746m² B1 SDNP/16/03850/OUT. There is a long history of planning being sought but not built. Based on the track record, the parish council are concerned that the new business component of any new mixed scheme will not be built out or will be subsequently amended to residential.
 - In the Stedham with Iping Neighbourhood Plan parish survey (September 2017), 92% of respondents expressed a wish to protect all employment.
 - The SDNPA Employment Land Review was updated in 2017 with a changed recommendation from ‘Continued employment use should be supported’ to one of ‘consider alternative uses’ – see Appendix 12. No mention is now given to the approved planning permission for expansion of employment on the western half of the site in 2016. There has been no local consultation on this document.
 - We believe that the Stedham Sawmill site should be included as a local employment site under policy SD25.
- 4.2. No regard has been given to dark skies (SD8) – The current commercial activity is relatively dark at night with any future residential development having a negative impact from lighting with the close proximity to SSSI and bats. Also in conflict with paragraph 5.59 to protect habitats where it states that, “*Lighting that would spill into sensitive habitats should be shielded or removed particularly if nocturnal species are present*”.
- 4.3. There is no policy for housing density in the SDLP but a proposal for 20 dwellings on approximately 0.5 – 0.6 Ha equates to 33 - 50 dwellings/Ha. This is above the threshold for CDC of 30/Ha, and is inappropriate for such a rural location.

In summary, Stedham with Iping Parish Council feel that the proposed site SD92 is inappropriate and should be removed from the Local Plan. We have undertaken to develop a Stedham with Iping Neighbourhood Plan that meets SDNPA’s desired allocation of some 16-20 dwellings for Stedham, as well as retaining current and proposed levels of employment, but in a manner that is more sensitive to the needs of the community as a whole.

The Parish Council is looking forward to completing its emerging Neighbourhood Plan in partnership with SDNPA officers which will result in a sustainable alternative to the current proposal.

Jane Crawford

Clerk to the Council 20 November 2017

Appendix 1

STEDHAM WITH IPING PARISH COUNCIL

Chairman: Eddie Lintott

Clerk: Jane Crawford

email: clerk@stedhamwithiping-pc.gov.uk

website: <http://www.stedhamwithiping-pc.gov.uk/>

SDNPA SITES AND SETTLEMENTS CONSULTATION

We attended the SDNPA workshop of 2 November 2016 and refer to the plans for Stedham. Our comments are as follows:

1. Local Green Space Designation.

Stedham with Iping Parish Council **SUPPORTS** the recommendation for conferring Local Green Space Designation on the four plots labelled LG 54-57 inclusive.

2. Draft Housing Allocation

Stedham with Iping Parish Council **OBJECTS** to designating Stedham Sawmills site plot HR43 for housing and we are disappointed that our previous objection has been ignored. A copy of our email dated 3 November 2014 is attached which deals with the principle of use on the site and the policy adopted by Chichester District Council which is still in force. We understand that up to 30 houses are being proposed and we do not believe the SDNPA should be contemplating housing development on this site in direct contradiction to CDC's policy of maintaining B1 business use here.

3. History of housing in Stedham

The 1841 census shows that there were just over 100 houses in Stedham. In 1900 many of the present houses in the village had not been built. Much of the ensuing building was for tenants and employees of the Scrimgeour Estate.

In 1949 the fields behind School Lane were acquired by the Midhurst Rural District Council which began developing the Common View estate by building 10 houses allocated to selected tenants. There are now 120 dwellings at Common View out of the total of 197 houses in the Stedham SPA making up some 61% of Stedham's housing.

4. Stedham Sawmills site history

This site has been developed on land that was originally common land and part of Stedham Common. The Commons Commissioner, however, in 1978 accepted statements that the area had been in continuous commercial use as a sawmills business since 1948 (and indeed long before that - since the 1890s) and agreed to exclude the land from the registration of Stedham Common. In 1978 the site belonged to Holdynes, a light engineering firm, who in agreement with WSCC fenced the land and re-routed the footpaths.

In 1981 new joint site owners of the site applied to build 6 light industrial units. In 1983 applications were made for 24 units and in 1984 for a further 10 units.

It was discovered in 1988 that the land as part of Stedham Common was still subject to common rights which were eventually extinguished in 1989 and the land was deregistered as common land.

In October 1988 the joint ownership ended and the land was split between the owners. The eastern part has continued to be used for several different businesses.

The western part of the site was re-sold and in 1991 the new owner gained permission for 15 light industrial units.

5. Current status of the site

The pattern of new owners of the western part of the site gaining planning permission and selling the land on without building the units has continued to this day and we understand that the long-term aim of the landowner has been to gain planning permission for housing.

The SDNPA is currently considering an application for up to 2,746m² (comprising 17 units of varying sizes) of B1 (light industrial) employment development, car parking and access (SDNP/16/03850/OUT).

This plan for the western part is the same as those already approved in 2007, 2010 and 2013 and we believe it should remain allocated for Business (B1) uses and that the current application, which we support, should be approved.

6. New SDNPA proposals

The whole site comprising the western and eastern parts has been designated for housing by the SDNPA. The total area of the plot (HA43) is approximately 1.5 hectares, which, according to the SDNPA, at current densities could provide up to 30 dwellings.

7. Unsuitability of the SDNPA proposals

- a) The existing businesses on the eastern part of the site, which provide local employment including the container storage facility, would have to be relocated. This would likely be outside the local area.
- b) The Sawmills site is one of the very few local employment providers in Stedham and with some encouragement has the ability of becoming the largest single employer. In this context, it is not correct for the SDNPA to say the site is unsuccessful. What has been unsuccessful since the 1980s is the failure to implement the planning consents by owners who have never had any intention of building the business units. Had the units been built our understanding is that they would have been taken up and would have benefitted Stedham and the wider local area greatly.

- c) 30 new dwellings are not required according to the CDC housing list which identifies only 8 requests from people who wish to live at Stedham. 30 is also more than planned for in CDC's local plan which proposed 6 dwellings.
- d) This stand-alone site is effectively isolated from the rest of the village except for a footpath access to School Lane. It will have to be a gated community because of its proximity to the main road, the common and the school and will be difficult for residents to integrate with the village. Re-drawing on paper the Settlement Policy Area boundary around the site will not achieve a wider cohesive community.
- e) The site can only be accessed from the main road, the A272, which residents would need to drive along before turning into the road that leads to the village.
- f) Major roadworks would be needed to bring together what will become busier Sawmills traffic, with the highway access to Stedham and the road to Minsted together with the heavy traffic on the ALR A272 which has a 60 mph limit at this point. Exiting and entering into this busy A road some 30 metres from the site entrance will need some traffic controls and road calming.
- g) The combination of a new housing estate with the re-modelling of the roads and highway work would create suburbanisation in an area that is still largely countryside. This will be to the detriment of the environment and inconsistent with the basic policies of the National Park.

8. Stage 7A Assessing suitability of land for housing □ Landscape

Housing on this land would be visible from the adjacent public footpaths, the adjacent common land and from Iping and Stedham Common Local Nature Reserve, a Site of Special Scientific Interest. They would be seen from the A272. The land rises from the east to the west side of the site which means the houses on the west side would also be visible from a wide area within the SDNP.

The proposed light industrial units would be much lower than houses. The containers and sheds on the eastern half of the site are barely visible from outside its boundary, although the hedge needs to be replaced along the eastern public footpath. Any new building south of Fry's Farm's boundary would detract from the visual edge to the village.

□ Noise

The site is adjacent to the A272 which has a speed limit 60 mph and is a busy and consequently noisy road.

An extra 30 houses would create their own traffic noise as well with residents' cars, service vehicles, deliveries and visitors. In contrast, light industrial use has the benefit of conditions to limit times of work and noise.

□ Previous land use

Rural light industry timber working since 1890s. There are several businesses and a container storage facility using the site at present.

□ Neighbouring land uses

The neighbouring land is Stedham Common which is a Site of Special Scientific Interest and part of the Local Nature Reserve. The site will have to continue to be

fenced to stop residents using the common as a dumping ground for garden waste for example. **Proximity of local services**

There is no shop, post office or doctor's surgery in Stedham. All residents need to travel at least to Midhurst for basic needs and nearly all the journeys are undertaken by car.

Apart from the Sawmills site, there are minimum work opportunities in Stedham and therefore the great majority of people travel out of the village to work.

Density and character of the surrounding area

There is no housing on any of the boundaries of the site. It is surrounded by fields on one side and common land on the other.

Flood risk

In heavy rain the lower part of the site is prone to flooding. The water drains through to the neighbouring fields and into the Stedham drainage system in School Lane. If this system is over-burdened, it can cause flooding danger to some houses in The Street.

Biodiversity

The land has been unused since the 1960s and used to be common land so there is a likelihood that protected species are present.

With the proposal to build 30 houses on this site, the extra people (and their domestic animals) would put more strain on the fragile habitats of Stedham Common.

Public Rights of Way

The Sawmills site has public footpath 916/3 along the whole of the eastern boundary right up to School Lane. Public footpaths 916/6 and 916/4 are adjacent to its western boundary and are the route of Stedham School's 'walking bus'. Parents park in the lay-by and cross the Sawmills site entrance to join the path to walk with their children to the school.

9. **Assessing achievability for housing 7C Access to the site and highways issues**

Access to the site is off the A272 on a bend where the speed limit is 60 mph. If HA43 were to be included for housing, it would be difficult to restrict the numbers of dwellings to a figure both compatible with acceptable traffic movements and the developers' expectations. The number of car movements in and out of the site at peak times onto the A272 would have an impact on existing roads so close to the Stedham Crossroads.

Third party land required

We believe that WSCC Highways would be involved in fairly major works on their land at the entrance of the site.

9. **Settlement Policy Area Boundary (SPA)**

Stedham with Iping Parish Council **OBJECTS** to the proposed SPA boundary for Stedham

Land at Sawmills Site

Our Parish Council has major reservations about the SDNPA redrawing the SPA boundary around a bit of land that is unattached to the main body of Stedham village.

We are also concerned that in the future the SPA could be drawn around other bits of land just because they are offered for housing.

We also believe that the term 'local' should be clarified. With a site of this size, it would seem by looking at the figures, that Stedham would be supplying housing to people from a much wider area than Chichester District or even the SDNP.

In summary, Stedham with Iping Parish Council recognises the national need for additional housing and the pressure being applied to the SDNPA to identify land opportunities. Our Council will continue the search for small sites within the village because that is the best and quickest way of integrating newcomers into the community. We believe that plot HA43 is too big and in the wrong place for the scale of housing development anticipated – and could end up a bigger problem than already exists. This is solvable by building the business units which would benefit the area to a much greater extent than housing.

Clerk to the Council
8 January 2017

Appendix 2

SHLAA Appendix-C-Summary-of-Site-Assessment-Outcomes 2014

Summary of Site Assessment Outcomes.pdf 47 / 118

Site Ref	Site Address	Settlement	Recommendation	Total Yield	0-5 Years	6-10 Years	11-15 Years	Rejected/Excluded Reason
CH122	Land north of the Forge	South Harting	Rejected	0	0	0	0	Development on the site would have a potential adverse impact on the character and appearance of the landscape. Details of full assessment in Appendix D.
Total by Settlement				0	0	0	0	

Summary of Assessment Outcomes by Area

Settlement: **Stedham**

Site Ref	Site Address	Settlement	Recommendation	Total Yield	0-5 Years	6-10 Years	11-15 Years	Rejected/Excluded Reason
CH123	Stedham Business Park / Stedham Sawmill	Stedham	Rejected	0	0	0	0	Development on the site would have a potential adverse impact on the character and appearance of the landscape. Loss of employment land. Details of full assessment in Appendix D.
Total by Settlement				0	0	0	0	

Settlement: **West Ashling**

Site Ref	Site Address	Settlement	Recommendation	Total Yield	0-5 Years	6-10 Years	11-15 Years	Rejected/Excluded Reason
CH125	Land south of Hester Close	West Ashling	Rejected	0	0	0	0	The site does not relate well to

SHLAA Appendix D iv Site Assessments by area - Chichester 2014

www.southdowns.gov.uk/wp-content/uploads/2015/02/SHLAA-Appendix-D-iv-Chichester.pdf

138

Site Ref	Site Address	Summary of Landscape Assessments	Summary of Suitability	Suitable	Summary of Availability	Available	Summary of Achievability	Achievable	Reason for Rejection
Settlement: Stedham									
CH123	Stedham Business Park / Stedham Sawmill	Medium/High Sensitivity The site is Medium High Sensitivity due to its important and sensitive location adjacent to Iping Common and limited connectivity to the settlement. However the site is PDL and offers potential for heathland regeneration.	The site is in close proximity to Iping Common Site of Special Scientific Interest (SSSI) and is with a SSSI Impact Risk Zone (IRZ) (requiring further advice from Natural England). There is woodland adjacent to the west of the site and a Grade II listed farmhouse adjacent to the site entrance.	No	There is no evidence that the site is available or being actively promoted. The site is in existing employment use.	Yes	There is no reason to indicate why development on the site is not achievable.	Yes	Development on the site would have a potential adverse impact on the character and appearance of the landscape. Loss of employment land.

Appendix 3

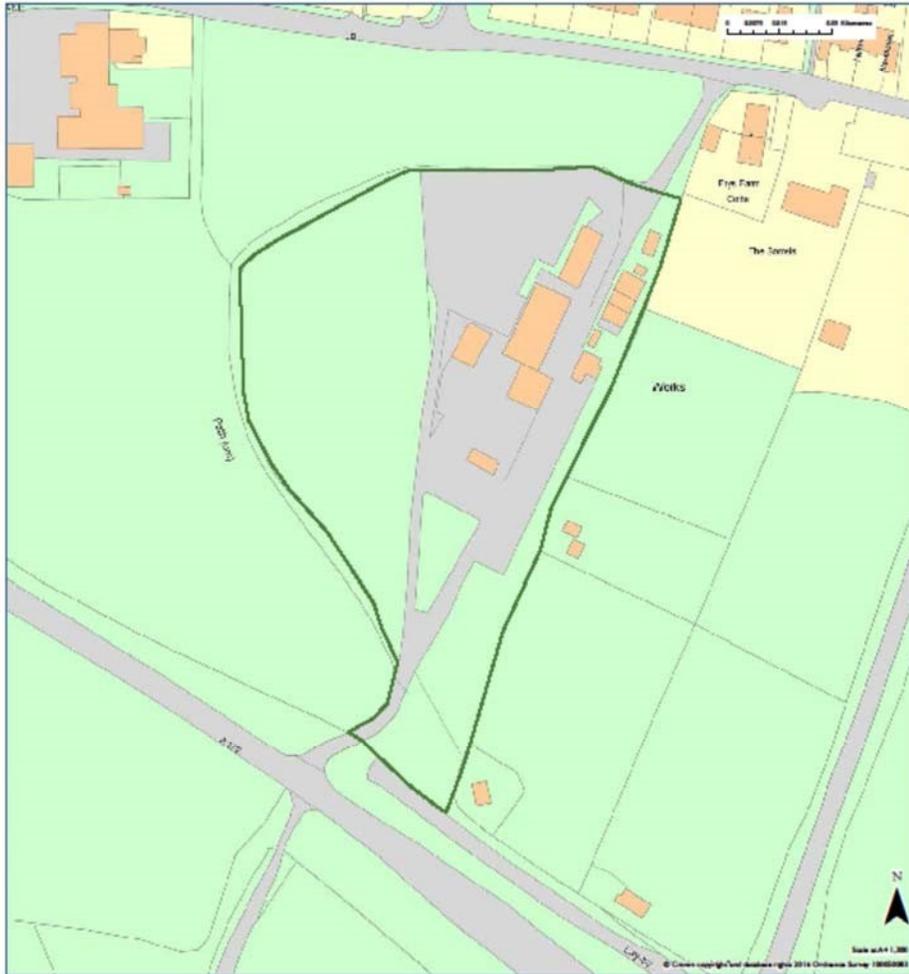
SHLAA – updated 2016 SHLAA recommendation - Appendix-D-Sites-with-potential

Strategic Housing Land Availability Assessment Site: CHI 23

Stedham Business Park / Stedham Sawmill

2016 Recommendation

 Has Potential



Site Reference CH123	Area Chichester		
Site Address Stedham Business Park / Stedham Sawmill	Settlement Stedham	Parish Stedham with Iping	
Source Previously assessed by Borough/District Council	Current Use Employment		
Summary of Landscape Assessment Medium-High Sensitivity The site is Medium High Sensitivity due to its important and sensitive location adjacent to Iping common and limited connectivity to the settlement. However the site is PDL and offers potential for heathland regeneration.			
Summary of Suitability Site is considered suitable for housing of an appropriate design and density to take account of landscape and ecological sensitivities. Currently under-occupied PDL site close to both village of Selham and to Midhurst.	Is the site suitable? Yes		
Summary of Availability Site has been heavily promoted for alternative use of residential. Site considered available.	Is the site available? Yes		
Summary of Achievability There is no reason to indicate why development on the site is not achievable.	Is development on the site achievable? Yes		
Assessment Recommendation	Has Potential		
Reason for Rejection Not applicable.			
Site Area (Ha) 1.2	Estimated Yield 30	0-5 years 0	6-10 years 30
			11-15 years 0

Appendix 4

Revised Sustainability Appraisal 2017 (see below) SD92 – comments

Sustainability Theme	Rating	Commentary	SIPC rating	SIPC Comments
Landscape	Likely positive	<p>The site is adjacent to an important area of common land (Iping Common) and is surrounded by woodland to the west. To the east of the site is an area of horse pasture and polo fields beyond. The site comprises a large area of open ground which appears to be regenerating and the built area of the site which comprises industrial buildings and associated screening vegetation.</p> <p>The site is of medium-high landscape sensitivity due to its important and sensitive location adjacent to Iping common and limited connectivity to the settlement. However, half the site is PDL and the remainder offers potential for heathland regeneration.</p> <p>The policy seeks to ensure a Landscape Visual Impact Assessment is undertaken to support new development, existing mature trees are protected and new planting initiated</p>	Likely adverse	<p>Difficult to understand how the commentary can be rated as likely positive.</p> <p>Limited connectivity to the settlement.</p> <p>No evidence of any reassessment from original 'all PDL' to now just 'half PDL'. No potential for heathland regeneration in proposal.</p> <p>No attention given to tree root protection Footpath along east and south west sides.</p> <p>Outside the CDC original settlement boundary for Stedham.</p>
Climate Change Adaptation	neutral	The site is not located within an area at risk of fluvial, surface water or groundwater flooding.	neutral	History of surface flooding
Biodiversity	Uncertain	The site has significant biodiversity constraints. The site is located adjacent to the Iping Common SSSI. As such it is located within the SSSI's Impact Risk Zone for 'residential development of 10 units or more'. The site is also located adjacent to deciduous woodland BAP Priority Habitat. These constraints are recognised by the policy which seeks to ensure that new development demonstrates that there would be no significant impact on the Iping Common SSSI	Likely adverse	<p>No mention of reduction in site area to protect neighbour tree roots.</p> <p>Summary states potential for heathland generation – a false statement given that the whole site will be redeveloped.</p> <p>Based on original assessment, how can it have been rated 'uncertain'?</p>

		through development of the site, existing mature trees would		
--	--	--	--	--

		be retained, space is allowed for new tree planting, and new planting should be suitable for pollinating species		
Cultural Heritage	Uncertain	The Grade II listed Fry's Farmhouse is located adjacent to the northern boundary of the site. The policy seeks to ensure a Heritage Statement is prepared to support new development	Likely adverse	No mention of Saxon shrine and possible archaeological impacts. Stedham has always been historically centred around the Rother and detached from A272.
Cultural Activity	neutral	No significant effects are anticipated.	neutral	
Health & Wellbeing	neutral	No significant effects are anticipated.	Likely adverse	Combining B1 and residential will create a problem. Noise & fumes from A272 and adjacent B1 A site separate from the main village does not promote community interaction. The residents on the site will also feel isolated.
Vitality	Likely positive	The development of c.16-20 dwellings will help to support the vitality and vibrancy of Stedham village and there will be some on site affordable housing provision	Likely adverse	Parish disagrees that will support the vitality because access is more towards A272. Combining B1 and residential will create a problem

Accessibility	Likely positive	The site is accessible to existing village facilities and amenities, including the school, pub and sports/recreational facilities. The site is also, due to its relative proximity to Midhurst (c.3.5km), accessible to the range of services, facilities and amenities located in this nearby larger town. Bus links between Stedham and Midhurst/Petersfield are however relatively infrequent with services once every 1-2hours during the day	Likely Adverse	Will be disconnected from centre of village. Access to north only via footpath. No mention of difficulties of access on to A272 for significantly higher number of movements. Cycling path to Midhurst.
Sustainable transport	Uncertain	Whilst the site is located close to an existing bus link to Midhurst and Petersfield, this is limited to a once every 12hours service during the day.	Likely adverse	How can this be scored as 'uncertain' when evidence known? Frequency, end destination, and timing of first/last bus are not suitable for commuting or evening trips.

				Questionnaire has 66% of employment >5miles from Stedham.
Housing	Likely positive	The delivery of approximately 16-20 dwellings on this site would help contribute towards meeting local demand for housing	Neutral	CDC 7/2017 has only identified local need for six: 5 x 1 bed, 1 x 2 bed. Having extra unneeded rooms just risks higher bedroom tax.
Climate Change Mitigation	Likely adverse	The development of approximately 16-20 dwellings at this location will lead to increases in the built footprint of Stedham- however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.	Likely adverse	

Local Economy	Likely positive	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality. Whilst there will be loss of existing employment provision, this will be replaced with up to 3,000m2 of B1 use employment floorspace	Likely Adverse	Disconnect with village will not support vitality. Current outline planning permission adds B1 on western site to existing B1 on eastern side. This employment opportunity will now be lost and very unlikely to be relocated as for storage and a joinery shop. In questionnaire, 92% supported having local businesses. B1 and residential not compatible and will result in continuous friction and likely eventual conversion to all residential.
Summary		The location of the site on previously developed land will help limit impacts on landscape and villagescape character and offers opportunities for enhancements to the public realm and heathland regeneration. The biodiversity constraints present in the vicinity of the are recognised by the policy, which seeks to ensure that new development demonstrates that there would be no significant impact on the Iping Common SSSI through development of the site, and development is accompanied by an enhancement of habitats		Fundamental errors in assumptions: - Not all previously developed land. No opportunity for heathland regeneration. Tree root protection not included. Will not support the vitality of the local area. Vehicular access naturally centres on Midhurst ribbon development. Very limited bus.
		on site. The development of 16-20 dwellings at the site will help meet local housing needs and support the vitality of the local area. The site is also accessible to village amenities, and relatively accessible to Midhurst by bus. Whilst there will be loss of existing employment provision, this will be replaced with up to 3,000m2 of B1 use employment floorspace.		

Appendix 5

SDNPA Local Plan consultation Sep 2017 Chapter 9 pages 339-341

STEDHAM

9.217 The village of Stedham together with the smaller village of Iping are combined into a single parish approximately two miles west of Midhurst in West Sussex to the north of the A272. The parish is located in the Western Weald broad area of the National Park. The historic core of Stedham, a conservation area, is the northern portion of the village. The southern portion of Stedham is a larger area of modern housing. To the south of the A272 is Iping Common SSSI.

STEDHAM SAWMILL, STEDHAM

Site area:	1.3ha
Current use:	Commercial; undeveloped open space
Environmental Designation:	Iping Common SSSI (to south of site)
Heritage Designation:	Listed building adjacent to northern boundary of site

9.218 The proposed allocation site is considered to comprise major development and as such proposals should address Core Policy SD3. The allocation site is a large open area located between Stedham and the A272. The eastern portion of the site is previously developed land currently used for commercial storage. The western portion of the site is currently open and undeveloped. The north, west and south of the site are mostly bounded by mature trees and vegetation which affords the site a degree of enclosure. To the east of the site are fields and outbuildings. The site has an existing vehicular access from A272. There are Public Rights of Way on the eastern boundary of the site and in the registered common land on the western boundary of the site.

9.219 The allocation site is located close to the Iping Common Site Special Scientific Interest (SSSI) which is south of the A272. The site is within the SSSI impact risk zone and as such development proposals must demonstrate that any impacts, including hydrological impacts, can be suitably mitigated. The site is located within an area of particular ecological value including protected species. An ecological survey and mitigation plan of the site will be required to ensure that development enhances opportunities for local ecology and protected species to flourish. Given the history of commercial use on the site, development proposals should be informed by a land contamination survey.

9.220 The allocation site is suitable for mixed-use development comprising business units and residential development. The western portion of the allocation site is suitable for Class BI (Business) units and the eastern portion of the allocation site is suitable for a modest residential scheme of up to 20 dwellings. Given the enclosed nature of the site and the proposed co-location of commercial buildings there is scope for the design of the housing to be either contemporary or traditional. Development proposals should address the setting of the listed farmhouse closely sited to the north of the site.

9.221 Vehicular access to both portions of the allocation site should be from the existing access onto the A272 to the south of the site. Security gates must not be placed at the shared vehicular entrance so as to form a gated residential community.

9.222 A suitably designed and publicly accessible pedestrian and cycle route should be provided which links through the centre of that portion of the allocation site proposed



for housing from the existing Public Right of Way to the north of the site to the southern site boundary. The re-routing and incorporation of the Public Right of Way on the eastern boundary into this new route would be supported in principle but is not considered a necessity for development to be permitted.

9.223 Development proposals should therefore be informed by the following evidence studies:

- Ecology Assessment including Protected Species Survey;
- Flood Risk Assessment and Surface Water Management Plan;
- Heritage Statement;
- Hydrogeological Survey;
- Land Contamination Survey;
- Landscape Visual Impact Assessment; and
- Lighting Assessment.

Allocation Policy SD92: Stedham Sawmill, Stedham



1. Land at Stedham Sawmill, Stedham is allocated for mixed-use development for between 16 and 20 residential dwellings (class C3 use), and employment buildings (class B1 Business use) providing a maximum overall floorspace of 3,000m². Planning permission will not be granted for any other uses. The residential development shall be located in the eastern portion of the site and the employment development shall be located in the western portion of the site.
2. Proposals which include security gates or other barriers which preclude the residential areas of the development from becoming fully accessible, inclusive and integrated to the local community will not be permitted.
3. Detailed proposals that meet the following site specific development requirements will be permitted:
 - a) To demonstrate that there would be no significant impact on the Iping Common SSSI through development of the site for residential and employment use;
 - b) Not to harm the amenity of the Public Right of Way on the southern, western and northern boundaries;
 - c) To provide a publicly accessible cycle and pedestrian route through the residential portion of the allocation site from site vehicular access to the Public Right of Way north of the site;
 - d) To provide for the amenity and privacy of its occupants and those of neighbouring properties;



- e) To provide for acceptable levels of daylight and sunlight reaching new residential dwellings and associated private amenity spaces;
 - f) The existing vehicular access should be suitably improved for use by occupants of all buildings;
 - g) To provide all necessary vehicular parking on-site to avoid additional on street parking; and
 - h) Existing mature trees to be retained
4. In order for the development to have an overall positive impact on the ability of the natural environment to contribute to ecosystem services, development proposals must address the following:
- a) Maximise available space for tree planting. Protect and enhance trees within the site where possible, and where trees are lost, provide at least the equivalent in new tree planting on site. Trees on the site boundary should be retained and new tree planting should be undertaken;
 - b) Minimise hard surfaced areas on site; and
 - c) New planting should be suitable for pollinating species.

SOUTH DOWNS
NATIONAL PARK

South Downs Local Plan Pre-submission Housing Allocation



Site Ref: SD92
Stedham Sawmill
Stedham

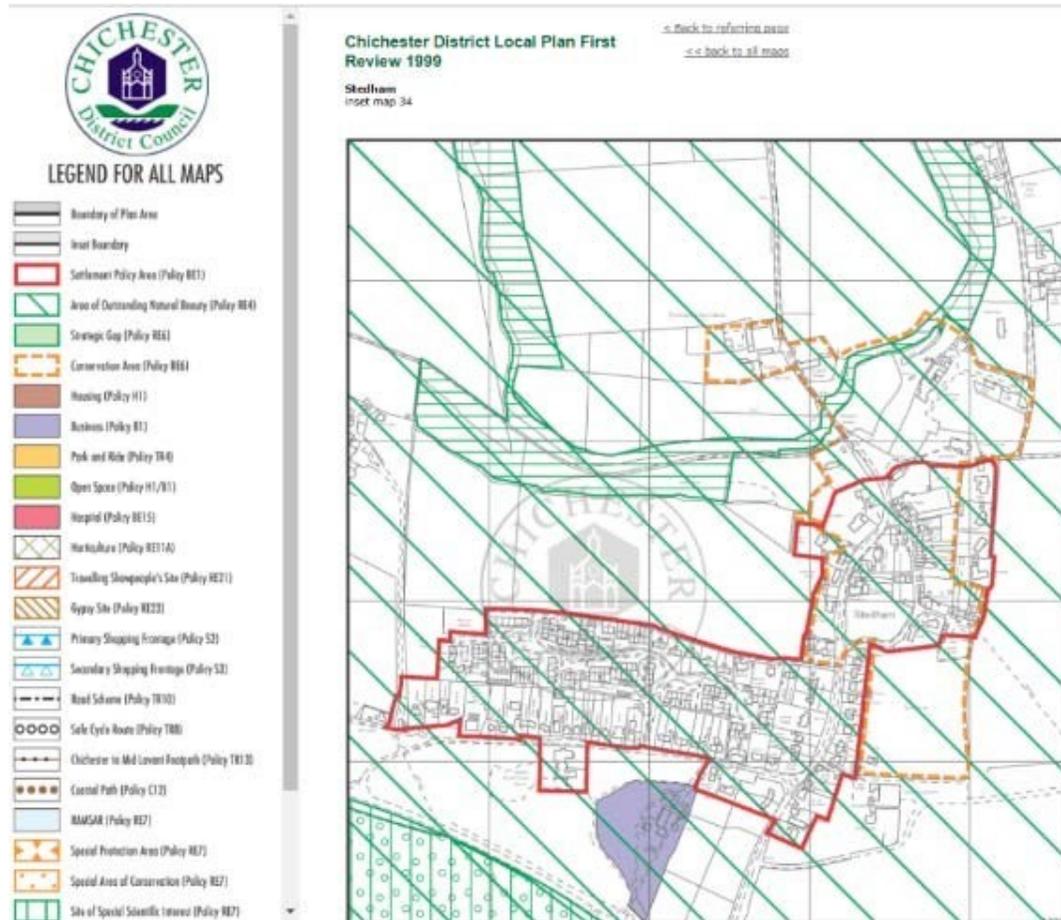


 SDNPA Pre-submission Housing Allocation



342

Appendix 6



Appendix 7

Appendix E: Appraisal sheets, site allocation policies

SA Report to accompany
Pre-Submission consultation: Appendices

Policy SD92: Stedham Sawmill, Stedham		
 <p>Number of dwellings allocated: c.16-20 dwellings and 3,000m² of employment floorspace Approximate size of site: c. 1.3ha</p>		
Sustainability Theme	Rating	Commentary
Landscape	+	<p>The site is adjacent to an important area of common land (Iping Common) and is surrounded by woodland to the west. To the east of the site is an area of horse pasture and polo fields beyond. The site comprises a large area of open ground which appears to be regenerating and the built area of the site which comprises industrial buildings and associated screening vegetation.</p> <p>The site is of medium-high landscape sensitivity due to its important and sensitive location adjacent to Iping common and limited connectivity to the settlement. However, half the site is PDL and the remainder offers potential for heathland regeneration.</p> <p>The policy seeks to ensure a Landscape Visual Impact Assessment is undertaken to support new development, existing mature trees are protected and new planting initiated.</p>
Climate Change Adaptation	-	The site is not located within an area at risk of fluvial, surface water or groundwater flooding.
Biodiversity	?	<p>The site has significant biodiversity constraints. The site is located adjacent to the Iping Common SSSI. As such it is located within the SSSI's Impact Risk Zone for 'residential development of 10 units or more'. The site is also located adjacent to deciduous woodland BAP Priority Habitat.</p> <p>These constraints are recognised by the policy which seeks to ensure that new development demonstrates that there would be no significant impact on the Iping Common SSSI through development of the site, existing mature trees would be retained, space is allowed for new tree planting, and new planting should be suitable for pollinating species.</p>
Cultural Heritage	?	The Grade II listed Fry's Farmhouse is located adjacent to the northern boundary of the site. The policy seeks to ensure a Heritage Statement is prepared to support new development
Cultural Activity	-	No significant effects are anticipated.
Health and Wellbeing	-	No significant effects are anticipated.

A140

Vitality of Communities	+	The development of c.16-20 dwellings will help to support the vitality and vibrancy of Stedham village and there will be some on site affordable housing provision.
Accessibility	+	The site is accessible to existing village facilities and amenities, including the school, pub and sports/recreational facilities. The site is also, due to its relative proximity to Midhurst (c.3.5km), accessible to the range of services, facilities and amenities located in this nearby larger town. Bus links between Stedham and Midhurst/Petersfield are however relatively infrequent with services once every 1-2hours during the day.
Sustainable Transport	?	Whilst the site is located close to an existing bus link to Midhurst and Petersfield, this is limited to a once every 1-2hours service during the day.
Housing	+	The delivery of approximately 16-20 dwellings on this site would help contribute towards meeting local demand for housing.
Climate Change Mitigation	-	The development of approximately 16-20 dwellings at this location will lead to increases in the built footprint of Stedham- however, given the amount of housing proposed for this site it is not anticipated that associated effects on greenhouse gas emissions will be significant.
Local Economy	+	Through increasing local housing stock, the delivery of housing at this site has the potential to support the village's vitality. Whilst there will be loss of existing employment provision, this will be replaced with up to 3,000m ² of B1 use employment floorspace.

Summary of appraisal:

Summary: Policy SD92: Stedham Sawmill, Stedham

The location of the site on previously developed land will help limit impacts on landscape and villagescape character and offers opportunities for enhancements to the public realm and heathland regeneration.

The biodiversity constraints present in the vicinity of the are recognised by the policy, which seeks to ensure that new development demonstrates that there would be no significant impact on the Iping Common SSSI through development of the site, and development is accompanied by an enhancement of habitats on site.

The development of 16-20 dwellings at the site will help meet local housing needs and support the vitality of the local area. The site is also accessible to village amenities, and relatively accessible to Midhurst by bus. Whilst there will be loss of existing employment provision, this will be replaced with up to 3,000m² of B1 use employment floorspace.

Potential significant effects?

None identified.

Recommendations

None proposed.

Key

Likely adverse effect	-	Likely positive effect	+
Neutral/no effect	?	Uncertain effects	?

Policy SD93: Land South of Church Road, Steep

Appendix 8



Appendix 9

ARCHI UK database – shows Saxon shrine near sawmill site



Appendix 10

STEDHAM WITH IPING PARISH COUNCIL HISTORY OF SAWMILLS SITE PLANNING

All the problems with the Sawmill site (SS) appearing on local plan for potential housing is that the land is being submitted by the landowner/landowners.

CDC local plan 1999 SS rejected on grounds of landscape (in the AONB)

- 1999 08 Chichester District Housing Survey Needs published
- 2000 07 SI Parish Appraisal published see Q30 and Q53
- 2011** **04 01** **SDNPA fully functional and became planning authority**
- 2012** 11 26 CDC meeting with parishes. Tim Slaney SDNPA head of planning talked about a management plan for the national park., about the park's main purposes and also that they had a statutory duty to serve local communities.
- 2013** 07 4 Email Chris Paterson SDNPA re SDNP Partnership Management Plan consultation.
- 2014** SDNPA SHLAA original assessment on Stedham Business Park:
Site rejected. Reason: Development on site would have potential adverse impact on appearance of landscape and loss of employment.
- 2014 03 Workshops organised by SDNPA on Local Plan and CIL. SIPC did not attend.
- 2014 ? Rowena Hill attended a meeting on planning in SDNPA (no record of it)
- 2014/10 23 Meeting at S Downs Centre attended by EL and Clerk. Agenda in file No 6 SDNP Local Plan. Stedham allocated 6 homes.
- 2014 11 03 Response to SDNPA re SHLAA. "As neither we nor the SDNPA officers can identify a suitable site for the 6 affordable homes currently on the SHLAA list, we believe Stedham should be excluded from the list"
- 2015 09 10 Meeting at Pulborough attended by EL and Clerk.
Sawmills site first mentioned as possible SHLAA site. Embargo on publicising sites.
- 2015 10 15 Applied for local green spaces and objected to SD Local Plan re SS.
- 2016 11 02 Meeting/workshop at S Downs Centre attended by JW and Clerk. See JW question on safeguarding local employment sites. About 30 houses for SS. Embargo on public discussion of sites.
- 2017 01 06 Email from Chris Paterson with links to website – no other notification that the embargo is lifted.
- 2017 01 08 Response to SDNPA sites and settlements consultation
- 2017 03 09 SDNPA planning committee meeting attended by JW who spoke to underline response to SDNPA in January & object to even the reduced number of residential units proposed
- 2017 05 10 Email from Christ Paterson inviting SIPC to SS site meeting because of changed allocation from 36 to 18 on mixed use site.
- 2917 06 15 SDNPA planning committee meeting attended by JW who spoke against suitability of housing on site & explained that a Neighbourhood Plan was being prepared with alternative sites
- 2017 06 23 SIPC Meeting with SDNP officers at Sawmills site
- 2017 07 11 SDNP Authority meeting attended by Chairman and JW. Chairman stressed support for additional housing within parish and Neighbourhood Plan well under way
- 2017 07 12 Chairman and Clerk meeting with Amy Tyler-Jones of SDNPA re Neighbourhood Plan

Appendix 11

SDNPA Employment Land Review 2015

C8 - Stedham Sawmill, Stedham

Site Area (ha)	Vacant Area (ha)	Nature of Vacant Land
1.07	0.58	Intensification of vacant / storage land

- 6.51 This is a single occupier industrial site located to the south of the village of Stedham. The site comprises a sawmill building with approximately half of the site is occupied by storage containers.
- 6.52 The western half of the site is currently open undeveloped land and provides potential to intensify use at the site. This land was allocated for employment use in the Chichester District Local Plan First Review (1999) but remains as yet undeveloped.
- 6.53 Planning permission (ref. no. SJ/07/01011/OUT, extended by SJ/10/01431/EXT and SDNP/13/02491/TIME) for the erection of 2,746 sq m of B1c 'light industrial' employment uses on the undeveloped western half of the site has been approved, with the latest extension approved September 2013.
- 6.54 To the rear of the site are residential properties, to the east is agricultural land, and to the west is woodland. There are limited amenities within Stedham - the closest amenities to the site are in Midhurst, approximately 2 miles away. There is a local bus service with stops within walking distance of the site.
- 6.55 Vehicle access into the site is off a service road running alongside the A272. Access into the site is via poorly paved lane, unsuitable for HGVs. There is dedicated staff and visitor parking on-site.
- 6.56 **Recommendation: This is a single user site which supports one of the key sectors identified in the Partnership Management Plan. The land allocated in the Chichester District Local Plan now benefits from planning permission and can therefore be regarded as a commitment. Continued employment use should be supported.**

Appendix 12

South Downs National Park Authority: Employment Land Review 2017 Update (2017)

Site ref	C8
Site name	Stedham Sawmill
Address	Stedham Sawmill, Midhurst, West Sussex, GU29 0NY
Settlement	Stedham
District	CDC
Site visit date	10/05/16
Hectares	1.07
Number of units	1
Approximate vacancy rate (by unit)	0%
Name and type of businesses occupying the most space on site	Joinery workshop (not sawmill) and open storage
Key sector businesses? (Wood-related activities, food and beverages, recreation and tourism)	Yes- single user site Wood related activities
Businesses in the employment area cause	None
Estimated age of buildings	% Pre-1940
Quality of buildings	% Very poor
Parking provision	Parking provision adequate for existing businesses
Comments	Very poor quality, under occupied site
Recommendation	Consider alternative uses