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Date: 16 May 2018

Regulation 14 Neighbourhood Plan Consultation

We write as a farming and landowning representative to raise our concerns regarding your approach to local greenspace within the draft Plan. As you are aware, government has produced guidance concerning "how land is designated as Local Green Space"¹ and we are concerned that your approach is not consistent with the provisions in several key areas.

Firstly we note that the guidance states "*plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making*". The two sites allocated for housing development within the plan appear to provide a very narrow scope for delivering the assessed need of eighteen dwellings. It is possible that the plan will end up delivering less than this number and there seems to be no objective assessment considering this risk. Taken in the context where the parish has rejected several other sites, we feel this is a defensive strategy and local green space designations may indeed have been proposed as a means to undermine the identified development needs.

Our concern is particularly drawn to "Rectory Field" rejected as a possible site for residential development, despite having been allocated as such within previous strategic plans. The site is now proposed for designation as local greenspace and we feel this is a deliberate attempt to preclude development, rather than recognition of any particular special qualities that it may possess.

Whilst recognising that the site provides good vehicular access and flat ground suitable for dwellings, the "assessment of potential development sites" makes a number of untested assumptions regarding the 'agricultural heritage', 'historical farmland' (both quite nebulous terms) and landscape and visual risks (albeit these remain largely undefined) of housing development. This lack of detail presents a significant concern as it substantially impacts on the landowners' options for this fifteen acre field.

The field in question is entirely isolated from the rest of the landowner's holding and as such presents logistical challenges to continue farming on a commercial basis. The farmer reports frequent complaints by local residents on every occasion during which they move stock to and from this field and for numerous reasons they feel that its farming viability is limited. Whilst parishioners seek to preserve a bucolic view of "agricultural heritage" out of their kitchen windows, this will not cover the cost of keeping that land in good agricultural condition.

We note that the assessment considers it a weakness that the field is "*Far too big for local housing*" but the parish has made no attempt to engage on the possibility of a smaller well designed scheme that enables both the provision of local housing and a means of funding a retained area of local greenspace as an incorporated measure with that development.

¹ www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#Local-Green-Space-designation

The possibility of developing such a scheme seems to be recognised in the assessment *“Even if land for smaller number granted on western boundary then future application likely unless remainder of site used by communal facilities in registered green open space”*. But then goes on to say *“Generally held by residents to be important to views in/out of village.”* This latter statement gives the impression of seeking to prohibit development purely on the basis that residents are opposed without reference to an evidence based assessment.

We feel that there should be a middle path where the core elements of the view can be preserved, but where the landowner is provided an opportunity to secure a commercially viable outcome for their future.

Turning back to the planning practice guidance, there is a clear direction against the use of local greenspace designations if the land is already within a National Park. Whilst this does not preclude their use we suggest it raises the bar far higher in terms of what is considered *“demonstrably special”*. If it already has the significant statutory protection of the National Park then in most cases additional designation should not be necessary, particularly those made on Landscape and Visual grounds alone.

With reference to the qualities of a Local Greenspace, Paragraph 77 of the NPPF states that the designation *“will not be appropriate for most areas”* and should only be used *“where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife”*. As per our previous paragraph, within a National Park such qualities would need to be materially more special than the rest of the Park to warrant the additional level of protection.

With reference to the parish assessment of local green space, it is noted this is made on the basis of four criteria broadly consistent with NPPF 77. We are however concerned that the assessment uses the questions of *“proximity”* and whether the land *“is not an extensive tract”* as reasons to make a designation². For clarity the mere fact that the land is in close proximity to the village is not a reason to designate and should not be given prominence as it clearly has been. It is also noted that the assessment fails against the criteria of being actively and currently used by the community, due to the fact that the land is privately owned. This restricts the value of the field to the community to one of a landscape and visual proposition, which in the context of a National Park would need to be of significant international scenic beauty to warrant the additional protection. It is considered unlikely that the field meets this criterion when considered in isolation.

As far as we can tell the only material statement within the assessment is that *“This field provides important open and uphill views from the surrounding houses and up Sandy Lane from The Street. It borders the conservation area forming an important green boundary and setting the village in its location amidst agricultural land.”* However:

- a. To what degree does the field provide *“important views”*? The threshold specified in NPPF 77 is whether the evidence identifies the site as being *“Demonstrably special, holding particular local significance”*. This implies designations must achieve significance over and above that which is normal to the village. Our interpretation is that the designation must be distinctive and set apart from any general or common experience of the village. Otherwise the rationale risks being applied to the whole village, which is clearly not the intended outcome. We see no evidence presented within the assessment as to why this particular view should be cherished and preserved over and above any other within the local context.
- b. We are concerned with the wording that the land forms *“an important green boundary and setting the village in its location amidst agricultural land.”* The assessor seems to be suggesting that the designation would operate as a limitation to the village envelope. Our view is that this approach is strictly prohibited by the guidance, which states *“designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.”* We feel there is a significant risk that the Parish has attempted to do just that.

In summary the Parish council has not submitted an evidence based assessment to evaluate the visual qualities of the land and so there is no clear way of telling if this view is *“demonstrably special”*.

² No.1 *“Reasonably close proximity to the community it serves”*; and No.3 *“The area is local in character and not an extensive tract of land”*

Furthermore the threshold within a National Park needs to be commensurate with the national significance of the site i.e. any additional designation should only be made in circumstances where the location is demonstrably special to the Park as a whole. Finally the evidence submitted by the parish focusses on protecting the size and envelope of the current settlement, which is in our view an incorrect application of the local greenspace policy.

For these reasons we respectfully request you remove Rectory Field from the Neighbourhood Plan as we believe a more sustainable outcome can be achieved by enabling some development in this location in order to secure a community asset for the long term future of the village.

I would be very grateful if you could confirm in writing how the Parish Council intend to respond. I would also be grateful if you could add my contact details to your circulation list as we are intending to make representations at future stages of the consultation.

Yours sincerely

T.Ormesher

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