

Harting Parish Council [R407]

The Statement of Community Involvement: Position Statement

1. The Council does not doubt the SDNPA's statements regarding the different ways and number of times it has engaged with the public, parish councils etc, but the effectiveness, particularly in terms of timeliness, transparency and consistency with policy/strategy, of that engagement is debatable.
2. In particular, many communities which chose not to do Neighbourhood Plans had new site and housing number allocations revealed very late in the evolution of the *Plan*. Whether or not communities object, there has been no Regulation 18 consultation on these changes which for some settlements are quite major.

The Council's Experience

3. Aside from responding to formal consultations, the interaction the Council itself has had with the SDNPA has been via parish council workshops, two 1-to-1 meetings and two representations made to the SDNPA's Planning Committee regarding site allocations in South Harting.
4. Subjectively, the Council feels that, perhaps inevitably as the Plan developed and policies were 'firmed up', there was progressively less two-way senior-level communication at the workshops. That said, following the formal presentations, there was useful informal discussion with some individual officers, but time available for these was of necessity limited.
5. The Council had a 1-to-1 meeting with SDNP officers on 12 September 2014 and a second one on 11 April 2017. The former, early in the planning process, was informative and useful, amongst other things in seeking the Council's views on the four sites at that point under consideration as part of the SHLAA process.
6. In contrast, the meeting in April 2017 was unproductive and frustrating.
7. That meeting arose from the Council's representations at the SDNPA's Planning Committee meeting on 9 March 2017 at which two councillors highlighted the problems with the site allocations in South Harting (SD90 & 91, consultation responses #576 & 578 respectively).
8. The meeting was requested by the officers apparently in order to discuss alternative sites in confidence. None were proposed. Furthermore, the brownfield alternative¹ proposed by the Council was dismissed without any consideration because it is not in the South Harting settlement boundary.
9. The Council now believes that as a result of the revisions to SD25, which were well advanced at that time, the officers' refusal to consider the brownfield alternative

¹ Builders yard & offices at Station Yard, Nyewood, GU31 5HX.

was wrong. The Council will present Position Statements for the relevant Hearings to be held in December.

The Community

10. The Council's main points arise from community engagement more widely.
11. There was a very high objection rate (nearly 80%) to the proposed allocations in the *Preferred Options Plan*, with another 15% or so supporting with changes and only about 6% unreservedly in support². This result should have been an alert to the SDNPA that communities needed to be better involved in the subsequent process.
12. The majority of members of the public are naturally more interested in site allocations, housing numbers and settlement boundaries (signalling future scope for development) than they are in other details of local planning. They do not have the expertise, let alone the time, to read and understand all of the supporting documentation. Hence, it is particularly important that the documents most likely to be read, i.e. each draft of the *Plan*, are transparent on these topics.
13. The Table below summarises issues relating to changes in site allocations, housing number allocations and settlement boundaries. There is wide-spread bewilderment that such changes could happen without consultation under Regulation 18.
14. New sites were proposed by the SDNPA shortly prior to its November 2016 parishes meeting; plans were provided at that meeting. However, parish councils were put in the very difficult situation of not being allowed to discuss these sites with their parishioners. The sites were only made public at the SDNPA's Planning Committee Meeting on 9 March 2017.
15. As the Table shows, 77% of site allocations in the *Plan* are new relative to the *Preferred Options* consultation. Was that Regulation 18 consultation undertaken too early? While one of the Gunning Principles says that consultation must be undertaken at a time when proposals are still at a formative stage, in this case the proposals had not yet been formulated. Communities rightly feel aggrieved about not having been able to express their views at the right time.
16. Also post the Regulation 18 consultation, there have been some significant settlement boundary changes. Housing numbers have also been increased for a significant number of settlements such that some now have allocations consistent with a Dispersed-Medium-plus-60% or higher spatial strategy, rather than the SDNPA's adopted Dispersed-Medium strategy (see Table).
17. Communities also query whether by allocating new sites and additional housing the SDNPA has treated those which chose not to do a Neighbourhood Development Plan fairly.

² *SDLP-03 Submission Consultation Statement* Fig. 1.2, p.12

**Summary of *Plan* Changes relative to *Preferred Options Consultation*:
Site allocations, housing numbers and settlement boundaries**

| Issue | <i>Plan</i> Changes relative to <i>Preferred Options Consultation (POC)</i> | Comments |
|----------------------------------|---|---|
| Additional sites | 24 (77%) of the 31 allocations ³ in Ch. 9 of the <i>Plan</i> did not appear in the <i>POC</i> | <ul style="list-style-type: none"> • For 9 of these 24 new sites, parish councils registered objections on behalf of their respective communities in the 2017 consultation; a further 3 registered support but with concerns. • Several sites had previously been rejected in the 2015 SHLAA and communities might justifiably have thought these sites would not re-appear at the last moment: there was no transparent statement in the <i>POC</i> stating that rejected sites would be re-assessed. |
| More houses for some settlements | <ul style="list-style-type: none"> • Increased numbers only for communities not doing a Neighbourhood Development Plan (NDP) • Increases not "... relatively small..." in all cases (contrary to the SDNPA's statement in column 3) • Even if small in absolute numerical terms, 50% of the settlements in Ch. 9 now have housing number allocations roughly <i>equal to or greater than those for a Dispersed-Medium-plus-60% spatial strategy</i>: a departure from the adopted Dispersed-Medium strategy. | <ul style="list-style-type: none"> • SDNPA: "At an early stage of plan preparation, it was decided that setting settlement-specific housing provision figures would provide certainty to local communities, and set a positive framework for neighbourhood planning, where relevant"⁴. • However, other than for those communities doing a NDP, some housing numbers have been increased: "The result has in some cases been that in simplistic percentage terms, there has been a significant increase or decrease⁵ for a single settlement compared with the Preferred Options figure. However this reflects that one is dealing with relatively small numbers, and does not represent a departure from the spatial strategy"⁶. In fact, there has been a departure from the Dispersed-Medium strategy (see middle column) |

³ Excluding sites which have planning permission and Gypsy and Traveller site allocations; in the latter case there is no site-specific information for comparison in the *Preferred Options Plan*.

⁴ *TSF-07-Supply of Housing Background Paper*, para 6.4, p.10.

⁵ More settlements have had their housing allocations increased than have had them decreased as a result of insufficient sites being identified.

⁶ *Ibid*, para 6.7, p.11.

| Issue | <i>Plan Changes relative to Preferred Options Consultation (POC)</i> | Comments |
|-----------------------------|---|--|
| Settlement boundary changes | The <i>POC</i> had Inset Maps showing 'before and after' settlement boundary outlines, but the <i>Plan</i> does not ⁷ : there is nothing obvious indicating quite significant changes to the boundaries of some settlements ⁸ beyond the inclusion of site allocations. | The changes could have been made transparent. Without an intimate knowledge of the existing settlement boundary, which few residents have, these changes will have gone unnoticed. |

⁷ The associated Settlement Inset Maps have no text and only the new boundary is shown.

⁸ TSF-05: Settlement Boundary Review: 2017 Update Background Paper.