



Walberton Parish Council comments on February 2020 HELAA

Walberton Parish Council (WPC) is writing to state its concerns and objection to the latest Housing and Economic Land Availability Assessment (HELAA) (February 2020). These are:

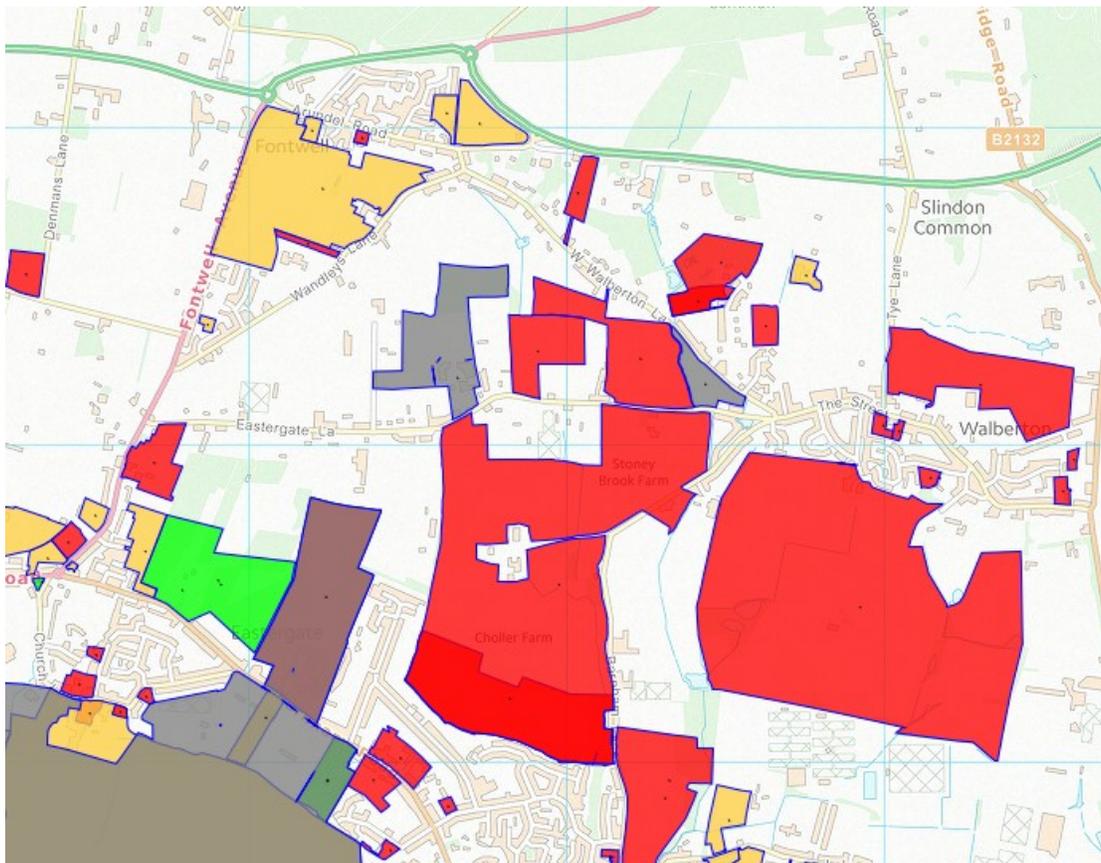
- ◆ there have been significant changes without consultation
- ◆ there are incorrect facts
- ◆ site identification is not evidence-based or compliant
- ◆ impacting the Strategic Gap between villages is a significant step away from the National Planning Policy Framework (NPPF) and Arun District Council (ADC) planning policy

Introduction

ADC invited Parish and Town Councils back in February 2016 to participate in meetings to discuss Strategic Housing Land Availability Assessment, SHLAA, now HELAA, and the allocation of housing.

These meetings were intended to have the parishes and ADC working together in consultation.

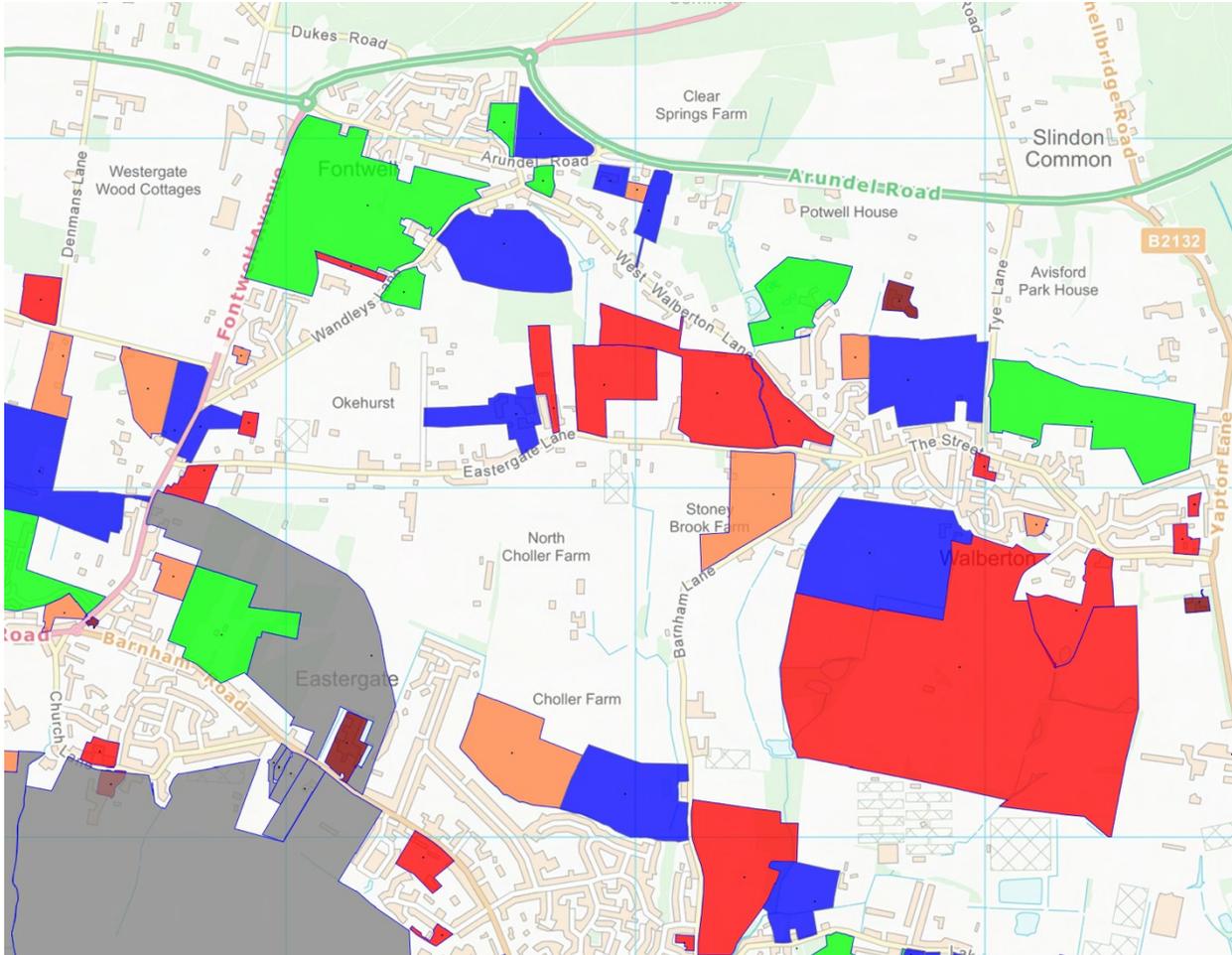
There have been no meetings since January 2019 and no communications since about any changes being made to HELAA. From 2016, WPC has worked with Arun in trying to correct errors in the HELAA but none of these were implemented. In February 2020 a new HELAA was produced without any notification to or consultation with WPC, or any other parishes as far as we are aware, and this remains incorrect.



In May 2016
our Parish
looked like this
on HELAA.

Since then many sites have been granted planning permission, culminating in a total of an additional 387 houses.

As a result of the February 2020 revision to HELAA our Parish now looks like this.



The HELAA states consultation with Parish Councils is part of the process. This is enshrined within the National Planning Policy Framework (NPPF) which refers to “A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community.” However, there has been no consultation on either the October 2019 or this new updated HELAA dated February 2020.

Assessment of HELAA

On inspection this new HELAA is noted to have several significant inaccuracies and inconsistencies, described further below, which means its methodology cannot be considered agreed, objective or consistent as the HELAA states is its own requirement. Nor can it be considered accurate which is also a requirement of the HELAA (ADC HELAA Report 2019 (AHR19) section 2.32, “The HELAA should be reviewed and updated on an annual basis in order to ensure that the information contained within it is as accurate as it can be.”). Therefore, it is felt the selections are at best misleading and make the HELAA not fit for purpose. As it is used as part of the evidence base for planning policy documents and policy formulation (AHR19 section 1.6, “The HELAA assessment is important evidence used to inform plan making”) these must be corrected, and any selections impacted by corrections reconsidered before the HELAA can be considered fit for purpose.

A number of the documents pertaining to the HELAA individual site assessments have been updated. However, the previous detailed versions of the site assessments from the 2016 are no longer present, only a summary document. This makes evaluation of the reasons for a change in classification challenging and not transparent. For the Neighbourhood Plan Review submission we are obliged to provide a list of changes to aid its external assessment. Presumably such a courtesy does not apply to HELAA and instead we are obliged either to check and download all of the site information on a regular basis and keep hold of it to enable such comparison to be made. Obtaining the documents from the ADC website has been challenging as they have often been unavailable due to server errors.

Note: the HELAA colour codes and definitions are used in the examples below. HELAA reference numbers are quoted to aid identification of sites.

HELAA inaccuracies

The HELAA clearly states its methodology for selection, which is based on the NPPF. This methodology has not reported robust, up to date evidence as also required by the NPPF.

Section 27 of the Localism Act 2011 (as amended) requires local planning authorities to promote and maintain high standards of conduct and adopt a local code of conduct, which should reflect the seven principles of public life, generally called the Nolan Principles. These include objectivity which requires “using the best evidence” for decision making. It is felt this HELAA does not fulfil these criteria.

Errors

In our basic review of the data presented, a number of errors are apparent.

1. As at October 2019 there were several sites which had planning permission previously granted, that were still shown on HELAA as red and therefore supposedly “not currently developable”. This has now been belatedly corrected. These included
 - a. Reference 94, Sunny Corner: permission granted 6/6/2019
 - b. Reference 18WA2, Wandleys Farm: permission granted 8/4/2019
 - c. Reference 18WA5, Lanes End House: permission granted 13/12/2018
2. The NPPF definition for deliverable is “...sites for housing should be available **now**, offer a suitable location for development **now**, and be achievable with a **realistic prospect that housing will be delivered on the site within 5 years.**” This is echoed in ADC’s classification in the guidance notes for the HELAA interactive map. The NPPF expands on this by clarifying that in particular”, to be considered available “now” these sites as “major developments” should have planning permission. Many of the Blue sites within WPC do not have planning permission. These sites include
 - a. Reference FON3, Land to West of A27
 - b. Reference NEWWA13, Wandleys Farm, East of Wandleys Lane
 - c. Reference HP3, S&G Motors
 - d. Reference NEWWA12, Land at Freeman Close, Eastergate Lane
 - e. Reference 18WA4, Land south of Walberton
 - f. Reference 17WA1, Land north of North Pound and West of Tye Lane
 - g. Reference 146A, Choller Estate, Land to north and west of Barnham Lane

The HELAA itself states that delivery within 5 years is not possible for some of these sites categorised as Blue.

3. Deliverability estimates are not known for some sites, but they are still promoted within the document. These are promoted as top-level estimates, even when it is known that significant flooding

and infrastructure restrictions means the yields would be lower. The data can therefore not be considered robust nor reflect the known true estimates and should be revised. Examples of this include

- a. Reference 146A, Choller Estate, Land to north and west of Barnham Lane: “Could be considered as a potentially developable site as no major constraints but substantial policy constraints mean delivery within 5 years is unlikely so put into the longer term yields. Flood mitigation measures will need incorporating.” Further consideration would highlight the area as being habitats for protected species, further delaying any development beyond the 5-year constraint.
 - b. Reference 18WA4, Land south of Walberton. It is noted that the land occupied by this site is part of that allocated to reference 123, Pigeon House Farm and Land to the South of Dairy Lane, a site classified as not currently developable due to constraints and a lack of suitability, availability or achievability.
4. Some of the sites classified as “Deliverable” are located within the gap between settlements to be protected between Walberton and Barnham, as described in ADC’s Adopted Local Plan Policy [SD SP3]. This would be expected to reduce the possibility of delivery within the 5-year period. These include
- a. Reference 18WA4, Land south of Walberton
 - b. Reference 146A, Choller Estate, Land to north and west of Barnham Lane.
5. Some of the sites classified as “Developable” are located within the settlement gap to be protected between Walberton and Barnham, as described in ADC’s Adopted Local Plan Policy [SD SP3]. These include
- a. Reference WA6, Choller Estate, Land south of Eastergate Lane
 - b. Reference 18WA3, Walberton House, The Street
 - c. Reference 19WA1, Land to the north of Elm Grove, Barnham
6. There are errors in the identification of the Parishes in which sites are located. For example, reference NEWWA13, Wandleys Farm, East of Wandleys lane is listed as being in Yapton Parish. It is in Walberton Parish.
7. There are errors in the assessment and description of individual sites. For example, reference FON3 (Site at Land to West of A27) states under constraints that there is a lack of public amenities and facilities, though it is very close (an easy walk) to those at Fontwell, including 2 fast food take-aways, grocery store, petrol station, off licence, racecourse, bar and restaurant, never mind those in Slindon. These are easily found on a desk-based assessment.

Inconsistencies

There are inconsistencies within the HELAA documents provided, where the proforma summaries and map do not agree, nor do the colour classification of the HELAA sites. In other places, site constraints are reported inconsistently between comparable locations. These lead to a questioning of the reliability and validity of the rest of the HELAA revision.

Examples of this include

1. Reference NEWWA14, Land to the rear of Woodacre. The map view states Amber (developable/deliverable in 6-10 years) while the textual support document states, “Not currently developable”.

2. Reference 18WA3, Walberton House, The Street. The map view states Amber (developable/deliverable in 6-10 years) while the textual support document states, "Not currently developable". The Neighbourhood Plan entry for this site is also missing and should read No.
3. References 146A, 19BA1 and NEWEG2, to name but a few, are noted as being outside the Built-up Area Boundary. This is not highlighted in the constraints in other areas such as 17WA1 and NEWWA12.
4. Reference 18WA4, Land south of Walberton, is noted as "Site is within the Barnham to Walberton Gap. A small part of the site covers part of a Local Green Space." This constraint is not noted for other sites that also suffer these constraints, such as references WA6, 18WA3 or 19WA1.
5. Electricity pylons are considered constraints in reference 19A1 but not in other areas affected by electricity pylons.
6. Landscape buffer is considered in the suitability summary in reference 111 but is not considered in WPC areas for other deliverable sites except 18WA4.

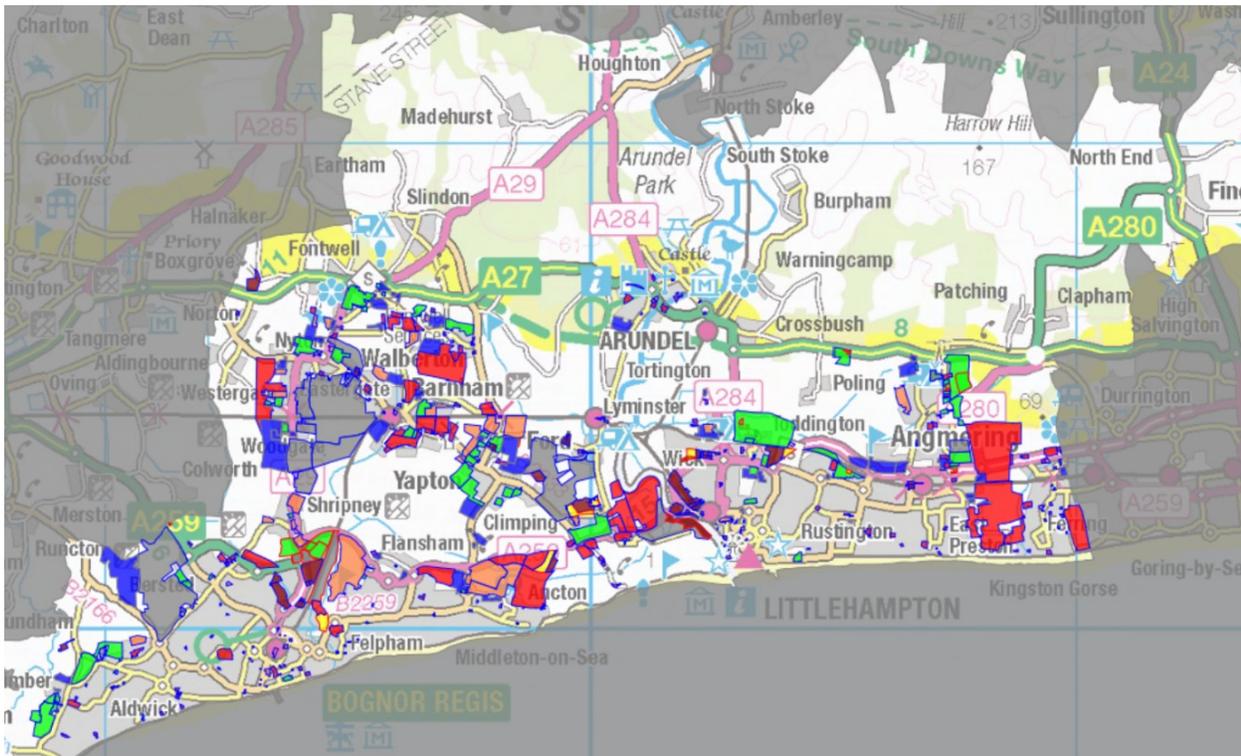
Not up-to-date

1. This HELAA is dated February 2020 and so would be expected to be up-to-date, as indeed the NPPF mandates. However, the document still refers to old data or expired timescales, for example
2. Reference 17WA1, Land north of North Pound and West of Tye Lane, states "As at Sept 2019 - promoter estimates submission of planning application (full / detailed) in November 2019."
3. Reference NEWWA13, Wandleys Farm, East of Wandleys Lane, states "Promoter estimates submission of planning application (outline) in Jan 2020."
4. Reference FON3, Land to West of A27 states "As at Sept 2019 promoter has estimated that ..."
5. Reference NEWEG2, site at 1 Northfields Cottages, Fontwell Avenue, states "Promoter estimates submission of planning application (outline) in January 2020". It is noted that this particular developer is already circulating literature to local residents referring to what could be considered to be a currently incorrect "Deliverable" HELAA assessment.

Green Infrastructure Corridor

There are five sites in the Strategic Gap between Barnham and Walberton references 146A, WA6, 18WA4, 18WA3 and 19WA1. Some are also part of the Green Infrastructure Corridor.

As the National Planning Policy Framework (2019.133) states the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. It continues to state Green Belt serves to check the unrestricted sprawl of large built-up areas and to prevent neighbouring towns merging into one another as well as assist in safeguarding the countryside from encroachment. It is also there to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. It also states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt (NPPF, 2019.145). These areas also create a wide range of environmental and quality of life benefits for local communities including wildlife corridors for local protected species, such as Bats, as the HELAA recognises.



A look at the overall HELAA could suggest Green belts are not being protected but targeted, and that urban regeneration is being replaced by urban sprawl, against NPPF objectives.

Housing numbers

The new HELAA, we have noted now includes eight Blue sites totalling 777 dwellings and five Amber sites totalling 265 houses.

Blue sites (Deliverable)

Reference	Site	Dwellings
FON3	Land to West of A27	55
NEWWA13	Wandleys Farm, East of Wandleys Lane	123
HP3	S&G Motors (part of the Neighbourhood Plan)	27
133	Land to the rear of Woodcroft (permission granted 28/11/19)	8
NEWWA12	Land at Freeman Close, Eastergate Lane	72
18WA4	Land south of Walberton	222
17WA1	Land north of North Pound and West of Tye Lane	146
146A	Choller Estate, Land to north and west of Barnham Lane	124
	Total	777

Amber sites (Developable)

Reference	Site	Dwellings
NEWWA14	Land to the Rear of Woodacre (part of the Neighbourhood Plan)	6
WA6	Choller Estate, Land South of Eastergate Lane	105
WA9	Land to the rear of Woodlands, Cresta	24
WA2	Land at Dower House, Parsons Walk	10
19WA1	Land to the north of Elm Grove, Barnham	120
	Total	265

In the 2011 census Walberton Parish had 875 dwellings.

By 2021 we will have 1,295 – an increase of 48% in 10 just years

Adding our Neighbourhood Plan Review sites will give us an increase of 55%.

Were even only half of the blue sites to be developed our increase would be 99%.

Complete development of all of the listed blue and amber sites in the HELAA gives a new total Parish size by 2030 of in excess of 2300 dwellings – an increase of almost 270%. With the current and proposed state of transport and public facilities this cannot reasonably be considered to be sustainable as required by the NPPF (2019).

Conclusion

Working together was the intention back in February 2016 – we are prepared and willing, but it would appear that ADC has changed its mind and is ignoring us and other Parishes.

We are not NIMBYs but believe that ADC's revised 2020 HELAA is misleading, inaccurate and not fit for purpose.

Walberton Parish Council

4th May 2020.