

Mr Andy Pepler  
Walberton Parish  
Council  
Parish Council Office  
The Pavilion, The  
Street  
Walberton  
Arundel BN18 0PJ

**Date:** 12 August 2020

**Our ref:** 16323/01/SSL/TJ/

**Your ref:**

Dear Mr Pepler

## **Walberton Neighbourhood Plan Review 2020: Representations relating to land at Pigeon House Farm (Land South of Walberton)**

We write on behalf of our client, the Church Commissioners for England (CCE) in relation to the above Walberton Neighbourhood Plan Review (2020).

As you will be aware, CCE owns land at Pigeon House Farm which lies immediately to the south of Walberton. The site was previously promoted for residential development as part of Arun District Council's (ADC) Housing and Economic Land Availability Assessment (HELAA) 'Call for Sites' process in 2016 but not taken forward by the Council at that time, due to potential landscape capacity and Local Gap impacts.

Since this time, CCE's landscape consultant, Fabrik, has further assessed the site in landscape capacity terms and considers that the site has potential for some development, albeit a smaller area than previously promoted.

Following this, a meeting took place with the Neighbourhood Plan Steering Group to discuss the potential of the site. The site was also promoted and assessed as part of the 2019 HELAA which determined that the site was deliverable in the next five years. However, we note that it has been decided by the Parish Council not to take forward this site in the Walberton Neighbourhood Plan (WNP).

Mindful that Walberton Parish Council (WPC) is reviewing its Neighbourhood Plan, we wanted to bring this land and the opportunity presented to your attention.

### **The Site**

The CCE land at Pigeon House Farm adjoins the existing settlement boundary and is accessed via Dairy Lane. This land. It is located to the immediate south of Walberton village; residential dwellings along Barnham Lane, Burch Grove, Homefield Crescent and Dairy Lane back onto the northern boundary of the site. Agricultural farmland lies beyond this to the south.

Land at Pigeon House Farm comprises a farmhouse, farm buildings and agricultural land which is generally flat. The buildings are not locally or statutorily listed, but there is a Grade II listed Dovecote at the southern end of Dairy Lane.

This site is located within flood zone 1 and is not at risk of flooding albeit, as for all land in Arun District, surface water drainage would require consideration. The land is tenanted and could be made available for development in the short to medium term.

## **Background**

Land at Pigeon House Farm was previously promoted through the ADC HELAA in 2016 as part of the evidence base for the Local Plan (2018) for a site area of approximately 12 ha. However, at that time, ADC did not consider the site 'developable' because it 'has a low landscape capacity for development and forms part of an important gap between settlements which prevents coalescence'. This finding assumed the whole site was developed for housing and drew upon the Landscape Study (2006) prepared by Hankinson Duckett Associates for ADC and West Sussex County Council, which considered the site to have a 'substantial' landscape capacity.

Having regard to this study and conclusions, CCE's landscape consultant (Fabrik), carried out a Landscape Capacity Assessment (LCA) to explore this finding and better understand the landscape capacity of the site, recognising that this might be smaller area than the 12 ha promoted previously.

The site has since been promoted through the ADC HELAA 2019. The site proforma has taken into consideration the smaller developable area of the site which has been recorded as 7.4 ha. The 2019 HELAA states that the site is within the Barnham to Walberton Gap, but that it could be considered suitable for development subject to further landscape and heritage work due to its location within the Gap between settlement and also its proximity to listed buildings. The current status of the site in the HELAA is that it is 'deliverable' and that it has the capacity to deliver approximately 222 homes. We would confirm that this is the case – albeit, it does not have to provide the full amount of homes through the current Plan Review.

We note that, as part of the WNP review, AEEDCOM have carried out an independent site assessment on behalf of Walberton Parish Council (WPC), commissioned as part of the Locality and MHCLG Neighbourhood Planning programme. This site assessment (February 2020) assessed the suitability of 26 sites. Of these sites, four were concluded to be suitable and seven sites potentially suitable.

The CCE site was concluded to be potentially suitable, but development would be constrained because of the Local Plan Strategic gap policy. AEEDCOM and subsequently WPC determined that the conclusions from the HELAA are not reasonable to be brought forward in the NP site assessment, as Arun District Council would need to be consulted to determine the site's conformity with local policy. Arun District Council Local Plan Section 7.1.5 highlights the importance of protecting the countryside by maintaining the built-up area boundary (BUAB) and Section 2.2.5 further clarifies the importance of the BUAB in control of developments in countryside.

Nevertheless, as you will appreciate this and the Green Gap policy do not prohibit new development from coming forward: Paragraph 7.2.8 specifically states that:

*The boundaries, whilst fixed as part of this plan (in accordance with paragraph 7.2.7 criteria) will also include boundaries where defined in Neighbourhood Plans and may be altered as part of other, separate, planning policy documents such as a site specific allocation document or indeed a new or revised Neighbourhood Plan (which is in general conformity with and supports the strategic policies of the Local Plan). The boundaries may also need to be reviewed if the Council is unable to find contingencies to meet any shortfall in its 5 year Housing Land Supply through a partial or full review of this Plan. [The underling is our emphasis].*

Further, Policy SD SP3 Gaps Between Settlements in Arun Local Plan (2011 to 2031) outlines developments will only be permitted within the gaps if:

- “a. It would not undermine the physical and/or visual separation of settlements;*
- b. It would not compromise the integrity of the gap, either individually or cumulatively with other existing or proposed development;*
- c. It cannot be located elsewhere; and*
- d. It maintains the character of the undeveloped coast;*
- e. or, if a subsequent DPD or Neighbourhood Plan deems it appropriate through an allocation.”*

However, the Plan also emphasises that the Policy approach on Gaps is ‘... as a planning tool designed to shape the patterns of towns and villages within the District. A clear break between settlements helps to maintain a “sense of place” for residents of, and visitors to, the communities on either side of the gaps. This can be assessed using measures such as inter-visibility (the ability to see one edge from another) and; intra-visibility (the ability to see both edges from a single point) [paragraph 7.4.4].

It is clear from this that there is scope to refine the boundaries through further analysis.

### **Landscape Assessment Capacity**

The Landscape Assessment Capacity study prepared by Fabrik has previously been submitted to WPC to demonstrate that although the site lies within the Local Gap, it is of ‘moderate’ landscape sensitivity and ‘medium’ landscape capacity overall (not ‘low’ as previously assessed). It identifies that approximately 6.5 ha in the northern part of the site, which adjoins the settlement boundary, could accommodate development by taking a sensitive approach that is responsive to the local landscape setting and seeking to retain and enhance site features and key views.

Importantly, the LCA concludes that the Walberton and Barnham Local Gap would remain, albeit the dimensions would change and that the landscape character of this gap would continue to comprise of farmlands with layers of tree belts, hedgerows and other vegetation.

### **Opportunity**

In terms of other considerations, the land is available for development. It is not located within a flood zone and nor are there any unusual site constraints that would restrict development. It is not within a Conservation Area and nor are there listed buildings within the site.

The land is suitably located for residential development as it adjoins the existing settlement and it is within a 10-minute walk of local shops and services. In terms of access, vehicular access could be obtained from Dairy Lane utilising the existing access to Pigeon House Farm and the land benefits from access to local bus services, namely No. 66 and 85. It has the potential to provide a sustainable extension to the settlement of Walberton.

Considering the above, up to approximately 6.5 ha of land at Pigeon House Farm could provide an opportunity to deliver approximately 200 new homes for the Parish, or fewer should this be preferred.

This could include a mix of housing types, including smaller units suitable for the elderly and affordable housing, subject to the usual viability considerations, and in response to Policy HP 6 Housing Mix of the Walberton Neighbourhood Plan (2020). This, in turn, could support the existing local shops and services at Walberton and potentially support new local facilities

### **Conclusion**

We would request that the Parish Council's re-consider the position of the CCE land at Pigeon House Farm as it is considered to offer potential through careful planning. We would be more than happy to discuss this with you and your fellow Councillors in more detail.

We trust this submission if helpful, but should you require any clarification, please do not hesitate to contact me.

Yours sincerely

**Tara Johnston**  
Planner

Copy                    Joanna Loxton / Izzy Grigg - Church Commissioners for England