



EASEBOURNE

Parish Council

Dear Sir/Madam,

South Downs National Park Local Plan – Regulation 19 Consultation on Proposed Submission Plan

Introduction

1. Easebourne Parish Council (EPC) submits that in its current form the South Downs National Park Authority's Proposed Submission Local Plan (the submission plan) is not sound and may not be legally compliant.
2. As a consequence of the methodology adopted by the South Downs National Park Authority (SDNPA) in preparing the plan, the proposed allocations for the parish of Easebourne are misconceived and would not, in our opinion, be capable of obtaining planning consent. The submission plan therefore contains policies, in particular SDA22, SDA23 and SDA24, which are not justified and will not be effective in delivering housing. The plan as a whole is therefore unsound.
3. The submission plan will be rendered sound if the Inspector requires that it is modified to remove these policies. This will have no 'knock-on' effect on any other part of the plan, or on the plan as a whole.
4. This representation is directed specifically to the statutory tests at examination: whether the submission plan is justified, effective, consistent with national policy and prepared in accordance with the relevant legal and procedural requirements.

Inaccurate factual baselines and incomplete evidence

5. According to the National Planning Policy Framework (NPPF), a local plan is only justified if it is the most appropriate strategy when considered against reasonable alternatives and based on proportionate evidence. EPC believes that the assessment of growth potential in the parish and the inclusion of policies SDA22, SDA23 and SDA24 is undermined by a series of material inaccuracies and omissions during the preparation of the submission plan.

6. Firstly, the population of Easebourne has been significantly understated. The SDNPA has used a figure of 1,170, whereas the 2021 Census records the population as 2,030 and more recent ONS figures place the population at approximately 2,047.
7. The SDNPA's error seems to have arisen because the parish includes two principal settlements as identified in the Easebourne Parish Design Statement (EPDS) adopted by the SDNPA in September 2023. These are the historic village and the separate King Edward VII Estate. The SDNPA appears to have ignored the population of the King Edward VII Estate from its assessments. Policies in the submission plan are based on a population assessment that materially distorts the scale of population growth in Easebourne.
8. Secondly, the evidence base appears to contain factual errors regarding the status and location of development and facilities. The King Edward VII Estate is wrongly treated as being in Fernhurst Parish rather than Easebourne.¹ The submission plan also describes the estate as "being developed" for 382 homes, without appearing to recognise that a substantial proportion of these dwellings (approximately 246) have been completed and occupied for several years. Only the balance is still under construction or planned.
9. The proper assignment of the King Edward VII Estate to Easebourne parish is important because it goes to the assessment of cumulative impact, infrastructure pressure and future capacity on the settlement of Easebourne. EPC asked the SDNPA to explain this and the population figure errors during the consultation process and was told that the SDNPA has considered the Easebourne settlement only rather than the parish as a whole. EPC considers that this approach misrepresents the scale and/or the impact of development on Easebourne and is therefore material as to whether the village can support additional development.
10. Easebourne has already experienced very substantial housing growth in a short period, including the development at the King Edward VII Estate (approximately 246 homes) and around 58 additional homes in the historic village. Approximately 145 further homes are expected or planned in the near term. This scale of growth has significant implications for population, traffic and service demand. If a major development has been wrongly assigned in the evidence base then the conclusions on future capacity, infrastructure and settlement sustainability must be considered unreliable.
11. There are also unresolved concerns about transport and sustainable movement. The submission plan states that Midhurst and Easebourne have strong potential to deliver sustainable mobility outcomes from new development, yet the SDNPA's own transport assessment (carried out in 2024) is understood to identify only "some

¹ See page 237 of the submission plan which incorrectly refers to the site as being in Fernhurst

potential”, with stronger prospects elsewhere in the national park. Neither Midhurst nor Easebourne are rail-connected and the nearest mainline station is several miles away at Haslemere, leaving the assignment of an amber rating (which is noted as largely being achieved by railway station proximity) for Easebourne and Midhurst as a puzzling conclusion. Reliance on theoretical accessibility, without robust evidence of realistic modal shift, undermines the effectiveness of the strategy and its consistency with national policy on locating new development close to sustainable transport links.

12. Taken together, these inaccuracies indicate that the submission plan’s strategy for Easebourne has not been based on proportionate, reliable and up-to-date evidence. That is a soundness problem in its own right. It also raises a legality concern if the evidence base published in support of the Regulation 19 consultation does not fairly and accurately inform consultees and the Inspector about the real baseline conditions against which the allocations are to be judged.

The grouping of Midhurst and Easebourne is unjustified, internally inconsistent and inadequately explained

13. In preparing the submission plan the SDNPA has effectively amalgamated Midhurst and Easebourne into a single settlement and treated it as such for the purposes of assessing development capacity. That is embodied in Policy SDE4 of the submission plan and expressed in site allocations starting at para 5.47 which says:

Midhurst and Easebourne are two separate settlements on either side of the River Rother in the Western Weald of the National Park. Their proximity means that they share many facilities, so it is appropriate to consider them together in this Local Plan.

14. It is correct that residents of Easebourne and Midhurst share many services and facilities, but the same is true of communities across the national park regardless of the distance between them. Proximity (or distance) cannot be the appropriate measure of whether two places are distinct settlements. That judgement should be made on the basis of form, character and design as well as shared services. In fact, Easebourne is a village with its own very distinct identity and heritage. It is very close to Midhurst but it is not part of Midhurst. That is highlighted by the fact that they sit in different county council and district council wards which reflects their different identities and needs. EPC considers that the grouping together of Easebourne and Midhurst deliberately and unreasonably obscures these distinctions. In doing so the submission plan promotes the erosion of village character by treating Easebourne as an extension of Midhurst rather than as a separate settlement whose capacity and constraints should be assessed on its own terms.

15. That becomes significant in the submission plan in that the site allocations for Easebourne are not considered against the correct criteria. They have been treated by the SDNPA as if they are as much part of Midhurst as they are of our village. That cannot be correct and runs contrary to the principles expressed elsewhere in the plan of promoting and enhancing settlement identity in the national park.
16. The inconsistency is sharpened by the apparent absence of equivalent treatment elsewhere in the submission plan. Other settlements that are physically close (such as the village of Sheet and nearby town of Petersfield) appear to be treated separately, whereas Midhurst and Easebourne, despite being separated by the River Rother and lying in different parishes, are combined for policy-making purposes. The SDNPA has stated that the grouping is purely presentational, but the way in which the submission plan has been prepared and the nature of the submission plan policies themselves (for example Policy SDE4) suggest otherwise. The submission plan should provide a clear evidential basis showing why this is the most appropriate strategy when compared with reasonable alternatives, but it does not.

Site-specific allocations are unsound and may be legally deficient

17. National policy requires local plan proposals to be justified by the accumulated evidence base and deliverable over the plan period. Site allocations SDA22, SDA23 and SDA24 are not justified by the evidence base (for the reasons explained above) and are likely to be undeliverable.

SDA23 – Midhurst Community Hospital and 1-2 Rotherfield Mews

18. EPC believes that this site should be reserved for a suitable community use. There is no evidence that it is not suitable for some beneficial community related purpose. The opportunity for an alternative healthcare or related use has not been properly examined.
19. EPC understands that the GP surgery (opposite this site) may not have been consulted about options to expand its own capacity despite the need for growth in its services arising from development in the area. In the absence of clear evidence from infrastructure providers, including the Integrated Care Board it cannot be assumed that the site is surplus to requirements.
20. There are serious local concerns regarding access to a constrained riverside site which raise serious questions as to whether the proposed allocation for a care home is deliverable. The road into the site is narrow, comprising a single lane with passing places and mature trees alongside. The site allocation cannot be considered as deliverable given that fundamental access issues remain unresolved.

SDA22 – Land adjacent to former Easebourne School

21. This proposed allocation raises such serious concerns over landscape, ecology, heritage, and access that it must be considered undeliverable. The site is currently open greenfield land consisting of a grass and wildflower meadow with mature trees and a pond on the south-western boundary. Development would degrade habitat value and conflict with the national policy requirement to conserve and enhance the natural environment as well as similar policies in the submission plan itself to such an extent that planning permission is never likely to be obtained.
22. The allocation is inconsistent with the SDNPA's own integrated impact assessment, which is understood to identify likely significant adverse effects across several measures including biodiversity, health and sustainable communities. If the SDNPA's own appraisal identifies significant harm, planning permission is unlikely to be obtained.
23. There are also significant unresolved issues relating to access. The site is approached from a narrow road used extensively by farm traffic, without a pedestrian footway and with limited lighting. Development at this location would not support active travel or sustainable patterns of movement. On the contrary, they suggest likely car dependence and additional traffic on an unsuitable route which is inconsistent with the SDNPA's stated aim "to address the causes of climate change".
24. EPC is also concerned that there has been no assessment of the likely impact of the development on this site on the Easebourne Conservation Area. We believe that the impact will inevitably be considered unacceptable and therefore that the site is not deliverable.

SDA24 – Land west of Budgenor Lodge

25. EPC considers this allocation to be undeliverable on the grounds of heritage harm, damage to ecology, landscape inconsistency, drainage risk and unsafe access. The development would cause harm to the setting and significance of Budgenor Lodge, a Grade II listed building, and to the historic relationship between the building and its open land. The open site contributes materially to the significance and character of the heritage asset, which would be irreversibly diminished by the proposed development. Our points made in relation to SDA22 regarding the degradation of habitat value and conflict with national policy in relation to the natural environment and the SDNP's own objectives also apply to this site.
26. The allocation also appears inconsistent with recent decisions on nearby fields rejected by the SDNPA only months earlier on the basis of high landscape sensitivity and urbanising impact. If neighbouring land with similar characteristics was

considered unsuitable, the authority must explain why this site is treated differently. Without a clear distinction in the evidence, the allocation appears arbitrary and therefore unjustified.

27. In addition, local evidence points to longstanding drainage, flooding, erosion and land instability issues, particularly during heavy rainfall. Residents report past flooding linked to the topography of the field, and climate change is likely to intensify these risks. EPC has seen no evidence to suggest that these impacts can be satisfactorily mitigated. The proposed access via Hazelwood Close and Canada Grove also raises tangible safety concerns, and the Council considers that too much reliance has been placed on material commissioned by the landowner rather than on independently robust evidence. These matters go directly to deliverability and therefore effectiveness.

Question of Legal Compliance

28. EPC raises the question of whether the submission plan is legally compliant if the evidence gathered by consultation and the baseline material used in the preparation of the submission plan by the SDNPA is inaccurate or does not accurately represent the local plan area. In this case the 'combining' of Midhurst and Easebourne represents a clear misrepresentation of this part of the local plan area and the relationship between settlements. At Regulation 19 stage, a local plan should be sufficiently clear, reasoned and evidence-led to allow meaningful representations. Where significant factual errors are present in the underlying strategy, or relevant infrastructure bodies have not been adequately consulted, or necessary heritage, cumulative impact or alternatives analysis is missing or deferred, the discharge of the SDNPA's obligations is called into question.
29. Legislation, the Planning Inspectorate Procedure Guide for Local Plan Examinations and the Government's Plan-Making Guidance all reinforce that a plan must be properly evidenced and procedurally robust before submission. The Council is not satisfied that these requirements have been met.

Conclusion and Modifications Requested

30. For the reasons set out above, Easebourne Parish Council is of the opinion that the South Downs Local Plan Proposed Submission Plan is unsound. Its understanding of Easebourne as a settlement is flawed, and as a result it makes site allocations which are not justified, not effective, and therefore not consistent with national plan making policy. It is also internally inconsistent with the SDNPA's stated aims and objectives for the national park. The Council also asks the Inspector to consider whether the Plan is legally compliant, given the apparent factual inaccuracies, incomplete evidential basis and procedural concerns identified in this representation.

31. Specifically, the Council requests that the relevant parts of the submission plan as they relate to Easebourne are modified to reflect the factual baseline and settlement data for Easebourne as described in this representation. The plan should also be modified so as to treat Easebourne as a fully separate community with its own distinct identity, opportunities and needs, and not to conflate the two settlements for policy making purposes. We ask that the site allocations SDA22, SDA23 and SDA24 are removed from the plan by way of modification. This would have no impact on any other part of the plan and would have a negligible impact on total housing delivery to which it is, in any case, unlikely to contribute.

Yours faithfully,

Mrs Emma Tremaine

Parish Clerk
On behalf of Easebourne Parish Council