

# Findon Neighbourhood Development Plan

**Update 1**

2019-2035

Submission Version

June 2019

**Consultation Statement**

## 1. INTRODUCTION

- 1.1 This Consultation Statement has been prepared by the updated Findon Neighbourhood Plan Working Group (WG) on behalf of Findon Parish Council (FPC), the 'Qualifying Body' to support the Reg 16 Submission version of the Findon Neighbourhood Development Plan, **FNP Update 1** (2019 - 2035).
- 1.2 The 'made' Findon Neighbourhood Development Plan (2016 - 2035) did not take the opportunity, at that time, to include housing site allocations to meet the housing provision. The **FNP Update 1** has been prepared to include housing site allocations to meet the housing provision for Findon as set out in the first South Downs National Park Local Plan which is currently at Inspection. The SDNPA hope to be able to formally adopt the Local Plan in late summer 2019.
- 1.3 This Consultation Statement contains a chronology of the stakeholder engagement that has taken place during the preparation of FNP Update 1, a summary of the main issues raised through the process and how these shaped the Pre Submission (Reg 14) FNP Update 1 and a summary of the main issues raised during the Reg 14 Consultation itself and how these have been addressed in the Submission (Reg 16) FNP Update 1.
- 1.4 This Consultation Statement illustrates the level of community engagement at the main stages of the FNP Update 1 process and how local consultation has been the key to and has positively shaped FNP Update 1, which includes housing site allocations.
- 1.5 This community engagement is a further re-engagement following on from the consultation undertaken during preparation of the FNP. It has arisen because the SDNPA, as LPA, subsequently included two Findon housing site allocations in the Pre Submission Local Plan, both of which are at landscape sensitive locations of local historic, and cultural heritage value, are in conflict with the core objectives of the 2016 'made' FNP and were brought forward without any community or FPC consultation.

## 2. LEGISLATIVE REQUIREMENTS

- 2.1 The requirement for a Consultation Statement to accompany a Submission (Reg 16) Neighbourhood Plan is set out in the Neighbourhood Planning (General) Regulations 2012, as amended, and also applies to an updated Neighbourhood Plan which includes major modifications, like new housing site allocations.
- 2.2 Reg 15(2) (a) to (d) states what must be included in a Consultation Statement.
- 2.3 This Consultation Statement includes the above requirements and a summary of the consultation exercise undertaken in accordance with Reg 14 requirements.

### 3. PRINCIPLES OF STAKEHOLDER ENGAGEMENT

- 3.1 Following the publication of the Pre Submission SDNP Local Plan in 2017, the community and FPC were surprised and disappointed that the SDNPA had not consulted the community or the FPC prior to including two Findon housing site allocations in that Plan. It had been understood, that although the 2016 FNP did not include housing site allocations, there would still be a proper opportunity for the community to have a say on where new housing should be located during the preparation of the SDNP Local Plan.
- 3.2 At a well attended community meeting in April 2017 at the School Hall, it was resolved to explore if there was an opportunity for an updated Neighbourhood Plan to include housing site allocations, to be prepared. A Working Group was formed comprising local volunteers from different parts of the village and two Findon Parish Councillors. The Working Group recommended that an updated Plan should be prepared and at their meeting on 26 June 2017, FPC accepted the recommendation and resolved that an updated Plan should be prepared.
- 3.3 It was recognised that the key to success of FNP Update 1, as it later became known, would be a transparent and inclusive process that would give the community a clear opportunity to express preferences for the location of future housing to meet the housing provision in the SDNP LP while supporting the core objectives in the 'made' FNP to conserve and enhance the local landscape character and local historic environment.
- 3.4 At the same time it was also recognised that the support of the SDNP would also be important to the success of FNP Update 1. This would involve making clear community and FPC representations on the unsuitability of the two housing site allocations during the formal Submission LP Consultation, and if necessary, during the LP Inspection. FNP Update 1 would also have to be robustly prepared with fundamentally different housing site allocations which were available, viable and deliverable within the period of Update 1 and had very significant community support.
- 3.5 Throughout the updated plan process the Working Group have ensured that the whole community, including residents, local businesses, interest groups, landowners and their representatives and wider interested parties including statutory and regulatory bodies have been actively consulted. This has included open consultation events, stakeholder engagement, housing site preference surveys and regular updates in local publications, social media and on the FPC and Findon Village websites.

- 3.6 The earlier consultation undertaken during preparation of the FNP in 2014/2016, including the NP questionnaires, housing needs survey and open consultation day feedback, is still up to date and relevant and provides a sound background consultation to the more targeted engagement on preferences for locations for new housing undertaken for FNP Update 1.
- 3.7 Representations have been made to the Working Group by SDNPA officers prior to and during the preparation of FNP Update 1, in particular to highlight the potential risks of over provision of housing in Findon should the Local Plan continue to include housing site allocations and FNP Update 1 include different housing site allocations, and if the two Plans were not deemed to be 'in conflict'. The Working Group consider however that the two allocations in the SDNP LP are in conflict with the core objectives in the 'made' FNP, which are retained in FNP Update 1 and although Update 1 will (and must) be in conformity with strategic policies in the SDNP LP, the housing allocations policies, which are not strategic, are fundamentally different in the two Plans and are considered to be in conflict. Where plans are in conflict, the policies in the later of the two Plans prevail. (NPPF)
- 3.8 It is also considered that the transparent and inclusive community and stakeholder engagement which is embodied in FNP Update 1 housing site allocations is the meaningful expression of the intentions behind the Localism Act and the aspirations of the Neighbourhood Planning Regulations; that is giving a proper say to the local community on the location of future housing than is afforded to the community through a Local Plan process.

#### 4. CHRONOLOGY OF CONSULTATION PROCESS

##### *Relevant FNP consultation 2015/2016*

- 4.1 In March 2016, in response to the Examiner's draft report on the FNP, FPC asked if they could include housing site allocations as a modification to the Reg 16 submission FNP, based on the responses received at 2015 open day consultation event where views had been sought on locations for future housing. The Examiner replied that it was not sufficiently clear that the respondents had actually been asked to indicate preferences for sites to meet the housing provision rather than more generally asked what they felt about future housing. If FPC wished to include housing site allocations in a FNP, at that stage, a clearer and more focussed consultation and preferences survey would have to be undertaken so that the community had been given a proper opportunity to have a say on the location(s) of future housing.
- 4.2 FPC felt that a further more focussed housing sites consultation, at that stage, would very significantly delay the progress of the FNP to the referendum stage and that there would be the opportunity for that consultation to take place through a SDNP/FPC/

community consultation on allocation sites prior the SDNPA bringing forward housing site allocations for Findon in the Pre Submission version of the Local Plan.

*Initial community consultation meeting: April 2017*

- 4.3 Following the publication of the Pre Submission Local Plan in March 2017, the community called a very well attended public meeting in the School Hall in April 2017 to discuss the two housing site allocations for Findon in the Pre Submission Local Plan. Parish Councillors and members of the FNP Working Group were invited to attend. The meeting concluded that the two housing site allocations were inappropriate, the locations being landscape high sensitivity, of local historic, cultural and heritage value and that there were much less sensitive and different sites likely to be available. The meeting resolved to explore if it would be possible to allocate different sites in an updated Neighbourhood Plan and called for a fresh Working Group to be set up. This can be considered the first consultation event for what finally evolved into FNP Update 1.

*UFNP Working Group and initial discussions with SDNPA: May 2017*

- 4.4 A Working Group was formed in May 2017, comprising local volunteer residents from different areas of Findon and two Parish councillors, led by a local volunteer planning consultant. On 26 June 2017 FPC resolved that the Working Group should go ahead with the preparation of an updated Neighbourhood Plan, on behalf of FPC. The Working Group had the benefit of full access to all the FNP documents, contacts, the FNP Working Group members and the communication channels used during the preparation of the FNP. The SDNPA were advised and an informal meeting was held with them to discuss the opportunities and the challenges involved with the preparation of an updated Neighbourhood Plan which would be likely to include fundamentally different housing site allocations from those in the Pre Submission Local Plan.

*Call for sites: June 2017*

- 4.5 In 2015 a first 'call for sites', within the settlement boundary, had been undertaken by FPC to supplement the SHLAA sites inside and outside the boundary on which the SDNPA provided details. Public notices, an appeal in Findon News and the FPC website and a mail drop were used to invite responses.
- 4.6 In June 2017, the updated Neighbourhood Plan Working Group checked the latest SDNP SHLAA and contacted landowners, or their representatives, of all sites or land parcels around the outside edge of the settlement boundary to ascertain which sites would be available, or potentially available for future housing. It had been clear during the preparation of the FNP that there were insufficient potential sites available

within the settlement boundary to meet the housing provision for Findon in the Pre Submission LP, of around 30 homes. This provision however had derived from a SDNPA capacity assessment of the two site allocations in the Pre Submission LP and had increased from a provision of around 20 homes for Findon in the 2015 Preferred Options Consultation for the emerging LP, undertaken by the SDNPA.

- 4.7 Responses from the 2015 first 'call for sites', the 2017 SHLAA and Working Group enquiries to landowners, brought forward 18 sites, including the SDNP LP allocation sites, with the capacity to absorb more than five homes, outside the settlement boundary and 2 sites within the settlement boundary. All sites were then assessed by the Working Group.
- 4.8 The initial assessment used a 'landscape first' methodology similar to that used by the SDNPA where sites or land parcels of 'high' landscape sensitivity or 'high' landscape value were rejected. 'Landscape First' assessment rejected 11 sites while one landowner stated that their site would definitely not be available. This left 8 sites to be considered for stage 2 assessment, including the 2 sites within the settlement boundary and the 2 sites allocated by the SDNPA in the Pre Submission Local Plan.
- 4.9 Although both of the SDNP LP allocation sites would have been rejected under 'landscape first' assessment, the Working Group accepted that this reflected a difference of professional opinion and weighting of local landscape sensitivity and local historic, cultural and heritage value and therefore brought forward these two sites for stage 2 assessment, in the interests of fairness.
- 4.10 The aim of stage 2 assessment was to identify site specific opportunities, restraints, mitigating features and access challenges that may need to be resolved, to inform the community at the public consultation day, before seeking their preferences for site locations and comments.
- 4.11 The sites and land parcels brought forward for stage 2 assessment and inclusion in housing location preference survey were:
  - 3b Downland paddocks east of Elm Rise (SD71)
  - 5c Land east of Pony Farm
  - 7 Soldiers Field House and Grounds (SD72)
  - 13 Monarchs Way Field (part only at Village Hall end)
  - 15 Paddock north of Nightingales

- 16 Former private allotments north of the Quadrangle
  - 19 Former Fire Station (currently an ambulance servicing depot)  
*(within the settlement boundary)*
  - 20 Atalanta/Mayland  
*(within the settlement boundary)*
- 4.12 The site reference numbers are based on those in the David Hares Landscapes 2015 LCA Report commissioned during the preparation of the FNP, with the addition of the 2 sites within the settlement boundary. SDNPA LP housing site allocation references are SD71, SD72 as shown above.
- 4.13 Following selection of the sites for stage 2 assessment the Working Group, together with site owners brought forward outline illustrative proposals and layouts for the public consultation event and the first, preferences survey. Representatives of the 2 sites allocated in the Pre Submission LP brought forward proposals and illustrative layouts independently from the Working Group who prepared the illustrative proposals for the other sites.
- 4.14 Details of all the sites and the 'Landscape First' assessments are included in the Evidence Base supporting Update1.

*Public consultation event and first consultation period: August 2017*

- 4.15 A public consultation event was held all day on the 14 August 2017 at the Village Hall. The community were invited by leaflet drop, flyers were displayed in Findon, an article was published in 'Findon News' and on the FPC and Findon Village web sites. The strap line on leaflets, flyers, and articles was '*Have your say on where future housing goes*'
- 4.16 Every household received a leaflet drop which included an explanatory introduction and a 'site preferences' ranking form which could be handed in at the consultation event or at the village store for up to 3 weeks after the event. An electronic version was also available using the 'survey monkey' platform which could be completed on line. Both the paper and electronic versions also included a section for comments on the sites and proposals. Comments and suggestions on other sites and other approaches were also invited.
- 4.17 A Findon map showing the location of all the sites, including the 'Landscape First' rejected sites and land parcels, individual site plans, photographs, illustrative proposals and illustrative housing layouts for the eight, stage 2 assessment sites were set up as an exhibition in the hall. Members of the Working Group were present to

introduce the sites and proposals, respond to queries, discuss matters and issues, receive feedback. A planning consultant representing the prospective developer of site 3b, (LP allocation site SD71) attended to present proposals for that site and respond to queries.

- 4.18 All the maps, plans, proposals and illustrative layouts were also available to view on the FPC and Findon Village web sites along with the preferences ranking form for the three week consultation following the public consultation event.
- 4.18 A total of 220 attended over the day and 454 individuals submitted valid preferences ranking forms by the end of the consultation period.

*First, housing site preferences ranking survey results: September 2017*

- 4.19 Respondents were asked to rank their preferences with '1' being their most preferred site and '8' being their least preferred site. The survey preferences format and analysis was undertaken by a professional marketing specialist on behalf of the Working Group. The preferences were arithmetically aggregated and the results presented as a set of totals, the sites with the lowest totals being the most preferred and the sites with the highest totals being the least preferred, as below:

16	Former private allotments north of the Quadrangle	1235
19	Former Fire Station (currently a vehicle servicing depot) <i>(within the settlement boundary)</i>	1378
15	Paddock north of Nightingales	1539
20	Atalanta/Mayland <i>(within the settlement boundary)</i>	1703
13	Monarchs Way Field (part only at Village Hall end)	2031
5c	Land east of Pony Farm	2144
7	Soldiers Field House and Grounds (SD72)	2249
3b	Downland paddocks east of Elm Rise (SD71)	2265

- 4.20 The detailed results table is included in the Evidence Base. First, second and third preferences for site no16, the most preferred, totalled 254 votes, for the second preferred site, no19, totalled 237 votes and for the third preferred site, no15, totalled

224 votes. In comparison, sixth, seventh and eight preferences for the least preferred site, no 3b totalled 260 votes and for the second least preferred site, no 7, totalled 242 votes.

- 4.21 The two least preferred sites were the proposed sites SD71 and SD72 in the SDNP Pre Submission Local Plan.
- 4.22 The marketing analyst reported that the 464 completed surveys represented, for this survey sample size, 16% more respondents than would be recommended to give a 95% confidence level, +/- 5% in the survey outcome. The population of Findon parish is c 2000, although the population on the electoral register eligible to vote in the FNP or any Update 1 referendum (aged 18 and over) is of significantly less.
- 4.23 The marketing analyst also reported that the 303 completed surveys from different households represented, for this survey sample size, 12% more households than would be recommended to give a 95% confidence level, +/- 5% in the survey outcome. The number of households in Findon parish is c 900.
- 4.24 The marketing analyst also reported that the local geographic spread of responses had been even across the different parts of the village, based on post codes provided on the survey forms.
- 4.25 The results were published in Findon News and on the FPC and Findon Village web sites. Landowners and their representatives were also directly informed of the results as well as the SDNP Local Plan policy team in September 2017
- 4.26 In November 2017, the Working Group and FPC also formally submitted representations to the SDNPA during the Submission Local Plan consultation, advocating that there were different housing allocation sites in Findon that were less landscape sensitive, more sustainable, viable and available within the period of the Local Plan and that had very significant community support as evidenced by the survey results. The representations further pointed out that the updated NP with different housing site allocations was advancing well.

*New site brought forward and second preferences survey*

- 4.27 Following publication of the results of the first housing site consultation and site preferences survey, a new site was brought forward as a possible housing allocation site by a local landowner, close to the most preferred site, no 16. The new site was the northern end of a field, currently a 'leisure' paddock, and adjoining, redundant agricultural buildings next to the garden centre. A 'landscape first' assessment undertaken by the Working Group concluded that as the site was a 'dry valley bottom' location, not readily visible in the downland landscape and had no identifiable local

landscape sensitivity or local historic, cultural or heritage value, it would be a suitable location for new housing. However as it had not been included in the first site preferences survey, but had good links to an existing access onto the A24, was available and offered the opportunity to be included in a coordinated master plan for the south west end of the village with the most preferred and adjoining site, no 16, the Working Group decided to run a second site preferences survey during December 2017.

4.28 Reviewing the high level of resistance to sites SD71, SD72 and site 5c in the first site preferences survey, the Working Group reasonably concluded that these three sites did not need to be included in the second site preferences survey.

4.29 As with the first site preferences survey, a leaflet drop was made to all households in the parish with the preferences form and a site location map and articles were published in the Findon News and FPC and Findon Village websites. There was also an opportunity to complete the ranking form electronically, via the Survey Monkey portal, as before. The closing date was 31 December 2017.

4.30 The response rate was much lower this time which probably reflected the time of year and a certain level of local exhaustion with surveys. Nevertheless the results still showed a clear preference for housing to be located mainly at the southwest end of Findon with the new site ranking as the second most preferred site:

		ranking preference
16	Former private allotments north of the Quadrangle	1
17	Part of paddock adjoining the Garden Centre	2
19	Former Fire Station (currently a vehicle servicing depot) <i>(within the settlement boundary)</i>	3
15	Paddock north of Nightingales	4
13	Monarchs Way Field (part only at Village Hall end)	5
20	Atalanta/Mayland <i>(within the settlement boundary)</i>	6

4.31 Sites 16 and 17 received significantly more than half the total response although there was little difference between them in first and second preferences. There was however no significant statistical difference between the ranking of sites 15 and 13,

but as the Village Hall Trust who control part of the access to site 13, decided they did not wish to make that part of the access available, site 13 could no longer be considered available, an essential criteria for any proposed housing site allocation.

4.32 The results were published in Findon News and on the FPC and Findon Village web sites. Landowners and their representatives were also directly informed of the results as well as the SDNP Local Plan policy team in January 2018.

## 5. MAIN ISSUES ARISING PRIOR TO PRE SUBMISSION CONSULTATION (REG 14)

5.1 The main issues that arose during the local engagement consultation day, the site preferences ranking surveys and comments made via the survey forms, in the lead up to the preparation of the Pre Submission updated Neighbourhood Plan are summarised as;

(a) Protect the local landscape character and local historic environment of sites that are important to the heritage of Findon, particularly the open downland pasture, Nepcote Green the historic sheep fair location and the race horse training and equine traditions that still strongly feature in Findon today;

(b) Protect important local viewpoints that retain the 'hidden in the landscape' character of Findon, particularly from public footpaths and bridleways near Church Hill, West Hill and Cissbury Hill and the approach road from the west over Long Furlong;

(c) Protect historic rural roads, Nepcote, Nepcote Lane, Cross Lane, Stable Lane from the adverse impact of traffic arising from housing development;

(d) Protect the historic centre of Findon, the Square and Conversation Area from the adverse impact of traffic arising from housing development;

(e) Seek improvements at the junction at the south west end of Findon with the A24 and a reduction of speed limit on that part of the A24 which adversely effects the connectivity of the south west end of Findon with the High Street and main part of the village;

(f) Seek the restoration of some of the former allotments;

(g) Deliver appropriate, more modest size, lower cost and genuinely affordable housing that better reflects local housing need than the new housing that was allowed in the previous Local Plan period;

(h) Seek opportunities to provide additional landscaped parking in parts of Findon where there existing parking shortfalls;

(i) Seek opportunities to facilitate the provision of community benefits via new housing development, like a replacement pre school;

(j) Protect local employment opportunities particularly at the Garden Centre and at local equine related businesses;

5.2 How these issues have been addressed within Pre Submission updated Neighbourhood Plan is set out below:

*(a) Protect the local landscape character and local historic environment.....*

5.3 The proposed allocation sites are at less landscape sensitive 'dry valley bottom' locations which are also relatively well screened by mature indigenous trees and hedgerows. The proposed sites are not close to equine heritage areas of Findon or the historic Nepcote Green.

5.4 The aspiration to see the designation of Nepcote Green and the historic racehorse training gallops on the adjoining open downland, in the 'made' FNDP is retained in Update 1 and the initial stages of designation have commenced with the SDNPA.

*(b) Protect important local viewpoints.....*

5.5 The proposed allocation sites are not visible from important local viewpoints, key public footpaths and bridleways, Church Hill, West Hill or Cissbury Hill or from the Long Furlong approach road. The 'hidden in the landscape' character will not therefore be further damaged by any new housing development.

5.6 In mid 2017 the Working Group gathered photographs from important local viewpoints, public footpaths, bridleways and historic rural roads, published this photographic record as a public data base on the FPC website. It is acknowledged by the SDNPA as a local Viewshed for Findon and can be used by promoters of development, FPC and the SDNPA to review the impact of development proposals on the local landscape and local historic environment.

*(c) Protect historic rural roads....*

- 5.7 The proposed allocation sites have good access to and towards the A24 without future traffic arising from the housing development having to use any of Findon's historic rural roads, either as a primary access or a 'rat run'. This will prevent any further damage to the banks of these mainly sunken roads, the mature hedgerows and trees, retain their character and not exacerbate conflict between racehorse training riders, other equine users, walkers and the vehicles which share these narrow roads.
- 5.8 The aspiration in the 2016 'made' FNDP to seek the designation of these historic rural roads as 'quiet lanes' to give them further protection is retained in Update 1 .

*(d) Protect the historic centre of Findon, the Square and Conversation Area....*

- 5.9 The proposed allocation sites have good access to and towards the A24 without future traffic arising from the housing development having to navigate The Square and Conversation Area, either as a primary access or a 'rat run'.
- 5.10 Following a strong lobbying campaign by the FPC TEP Group to realise a further aspiration in the 'made' FNDP, the highway authority WSCC, implemented a 20mph speed limit throughout the main part of Findon and introduced the first phase of a shared surface approach in the Square and Conversation Area, in 2018. The locations of the proposed allocation sites are in conformity with this aspiration and the first stage of implementation, by preventing the need for traffic from new housing development to have to use The Square or Conversation Area to access the A24.

*(e) Seek improvements at the junction at the south west end of Findon....*

- 5.11 Following further lobbying by the FPC TEP Group, the highway authority have undertaken speed surveys on the A24 and are bringing forward proposals to reduce the speed limit on the A24 to 40mph and introduce an improved crossing at the A24 for pedestrians and equestrians near the southern end of the High Street and the Black Horse, which will improve connectivity at this part of Findon;
- 5.12 This will alleviate local concern about the challenge of accessing the A24 via the Quadrangle, the access route for one of the proposed allocation sites, no 16, (HD11), on part of the former private allotments.

*(f) Seek the restoration of some of the former allotments.*

- 5.13 The proposed housing allocation on the former private allotments site includes a policy requirement to provide up to 9 restored allotments on part of the development site, which will meet the current waiting list for allotments in Findon.

*(g) Deliver appropriate, more modest size, lower cost and genuinely affordable housing that better reflects local housing need....*

- 5.14 The proposed allocation site policies are not only in line with the Submission LP policy requirements for the delivery of an appropriate percentage of more modest sized, genuinely affordable homes but at one allocation site, no 15 (SD12), require a higher percentage of genuinely affordable homes to be provided, This will be deliverable as the site is owned by Arun DC, the local housing authority;

*(h) Seek opportunities to provide additional landscaped parking....*

- 5.15 The allocation of site no 15 (SD12), rather than leaving it to come forward as a rural exception site where the LP policy requirement to provide 100% affordable homes will apply, allows the inclusion of two/three market homes, the sale of which will generate the funds to introduce additional landscaped parking into this part of Findon, one of the areas where there is a historic shortfall in parking and meet the abnormal infrastructure costs of developing this site;

*(i) Seek opportunities to facilitate the provision of community benefits....*

- 5.16 An allocation at site, no 13, the northern end of the Monarchs Way field adjoining the village hall and the separate village pre school; an old timber, converted, temporary classroom building on FPC land; would have provided the opportunity to fund the provision of a replacement pre school/community facility through the housing allocation. However the Village Hall Trust, owners of the village hall and land, decided that they did not wish to make available a small strip of land in their title by possession, to provide a more generous access to site no 13.

- 5.17 The Working Group engaged with the Village Hall Trust and tried hard to resolve this improved access issue for the benefit of the community, but reluctantly had to conclude that site, no 13, could no longer be considered for allocation during the period of the Update 1.

*(j) Protect local employment opportunities...*

- 5.18 Although the lease for the garden centre has been for sale for almost a year, without attracting any meaningful interest to date, it continues to trade successfully and not only provides a range of local employment opportunities but its cafe/restaurant also acts as one of the social hubs in Findon. The freeholder however, a local landowner has expressed an aspiration to retain a garden centre use on the site, providing a modern attractive facility after the current short lease expires in 4 years time, while bringing forward the under used agricultural buildings and the garden centre end of

the adjoining field, currently a paddock for leisure equine owners, as available for housing.

- 5.19 The site is a proposed allocation, no 17 (HD10) in the updated Neighbourhood Plan which will allow the retention of the garden centre and a future garden centre use. Allocation of this site should reduce pressure on the garden centre site to be brought forward as a change of use housing site in the event that the lease runs out without renewal or purchase and a garden centre use is subsequently evidenced by unsuccessful marketing to be redundant.
- 5.20 If however the garden centre use is evidenced to be redundant and no other appropriate employment uses are found to be viable, prior to determination of a planning application on site, no 17 (HD10), the policy in the Pre Submission updated Neighbourhood Plan seeks to transfer the housing allocation to the garden centre site. For this reason the proposed settlement boundary changes in the Pre Submission updated Neighbourhood Plan did not include the garden centre within the proposed new settlement boundary.
- 5.21 None of the allocation sites involve the loss of any paddocks, or will have any adverse effect on paddocks or equine facilities that are used by established, smaller equine businesses, that play an important role in providing continuity with Findon's unique cultural heritage, the training of racehorses, eventing horses and ponies.
6. PREPARING THE PRE SUBMISSION UPDATED NEIGHBOURHOOD PLAN.  
THE SUSTAINABILITY APPRAISAL AND SCOPING REVIEW
- 6.1 Following consideration of the results of the first and second housing site preferences surveys, the comments received at the consultation day and on the survey form and informal discussion with the SDNPA, the Working Group prepared Pre Submission Update 1 and associated maps, masterplan and background reports that would form the basis of the Evidence Base in support of the Pre Submission Updated Neighbourhood Plan.
- 6.2 The sustainability appraisal for the 2016 'made' FNP was considered to be still current as the 'made' FNP did support the 2015 SDNPA LP Preferred Options Consultation housing provision for Findon and the updated Neighbourhood Plan retains all the policies in the 'made' FNP that seek to promote economic, social and environmental components that demonstrate sustainability.
- 6.3 The SDNPA did however consider that a new scoping review was needed for the updated Neighbourhood Plan and arranged for this to be carried out before the Pre Submission version consultation. This scoping review conclude that neither a SEA nor a HRA were necessary for the updated Neighbourhood Plan.

- 6.4 Further discussions were held with the SDNPA on the preferred format for the Pre Submission updated Neighbourhood Plan. Although the Working Group preferred the updated plan to be in the form of a supplementary document to sit alongside the 'made' FNP, with retained FNP policies referenced in and only changes, new policies, supporting text and maps included in the supplementary document, the SDNPA sought a legal opinion which concluded that the Pre Submission updated Neighbourhood Plan should be the entire 'made' FNP, rebadged, with deletions and struck through and changes and additions included at the appropriate places within the 'made' FNP.
- 6.5 The Working Group accepted the legal opinion and prepared the Pre Submission updated Neighbourhood Plan in the recommended format. The Submission version however has reverted to a format which includes a list of retained policies from the 'made' FNP, new and amended policies, supporting text, maps and plans, for greater clarity, following further discussion with the SDNPA. The Submission version is known as Findon Neighbourhood Development Plan Update 1, as it is possible over the period of the plan there may need to be other updates.
- 6.6 While acknowledging the wish and right of the community to proceed with the preparation of the Pre Submission updated Neighbourhood Plan, with different housing site allocations to the SDNPA allocations in the Submission LP, the SDNPA policy team and members stated that it was unlikely they would remove the allocation policies in the Submission Local Plan, despite the LP including a paragraph which clarifies that, *'where a NP that included housing site allocations to meet the housing provision in the LP Strategic Policy, had emerged, the LP did not seek to allocate housing sites for that NP area'*.

*Pre Submission updated Neighbourhood Plan Reg 14 Consultation: Jun 2018*

- 6.7 The updated Neighbourhood Plan together with Local Viewshed were published in accordance with Regulation 14(a) of the Neighbourhood Planning (General) Regulations 2012, as amended, in June 2018. At the pre submission stage it was still known as the Updated Findon Neighbourhood Development Plan. (UFNDP)
- 6.8 Publicity for the consultation comprised:

Posters were put up on the village notice boards.

Five printed copies of the UFNDP were distributed to the village store, the village hall, the Gun, the Village House and the Black Horse where the public could review them.

News items were included on the FPC and Findon Village websites with links to view or download the UFNDP and Viewshed.

All landowners and other stakeholders who had been involved in the engagement process were emailed notification of the consultation and referred to the FPC and Findon Village websites.

6.9 The relevant, statutory consultation bodies were informed by email of the publication of the UFNDP, with a copy of the UFNDP and details of the consultation.

6.10 An email version of the UFNDP and the Viewshed was sent to the SDNPA, as the LPA.

## 7. MAIN ISSUES ARISING FROM THE REG 14 CONSULTATION

7.1 A summary of the main issues that arose as a result of the consultation are set out below.

7.2 The full, detailed comments received during the consultation are listed together with the Working Group detailed responses in a separate document included in the Evidence Base.

7.3 Thirty two consultation responses were received, mainly from statutory consultation bodies and the SDNPA. Six responses were received from local residents which although a relatively low number, probably reflects the extent to which local residents felt they had already been given a full opportunity to be engaged in the whole updated Neighbourhood Plan process including making representations through the Working Group members, at the open day and through participation in the two housing site preference surveys.

7.4 A summary of the main consultation responses, is set out below:

- (i) Local resident concern about the impact of additional traffic using the Quadrangle and the difficulty accessing the A24 at the existing junction.
- (ii) Two local resident concerns about the principle of the proposed housing site allocations at HD10 and HD11 as this would involve the loss of potential restored allotments, the loss of part of a paddock, and would be an unwelcome development in the former Local Gap between the Findon and Findon Valley settlements.
- (iii) Two local resident concerns about the possible loss of some open green space at the Oval to provide additional landscaped parking to address a shortfall in

this part of Findon, the provision of additional landscaped parking being associated with proposed allocation HD12, land to the north of Nightingales.

- (iv) Two local resident supporting the rejection of LP proposed site allocation SD71, paddocks to the east of Elm Rise.
- (v) Stakeholder support for proposed allocations from Arun DC, as housing authority at HD12 and from landowners' representatives at HD10 and HD11.
- (vi) Stakeholder objection in principle to the omission of sites SD71, SD72 and site 5c, land east of Pony Farm, from the proposed housing site allocations. In the case of SD71 and SD 72 the landowners' representatives support the SDNPA allocations in the Submission Local Plan and in the case of site 5c the landowner believed there should be an allocation to provide a fallback position for him should his then current planning application for a very large private house be refused.
- (vii) Statutory consultation support from Natural England, Historic England and no objections from utility companies or the Environment Agency.
- (viii) Statutory consultation 'no objection' from WSCC as highway authority and Highways England.
- (ix) Statutory consultation support from WSCC as flood authority, subject to consideration of detailed layout of housing on site HD11 to ensure the slight, but potential, local flood risk from the north would be addressed.
- (x) Statutory consultation concern from the SDNPA, as the LPA, about the proposed locations HD10 and HD11 (in principle concern), HD 12 (high associated costs of developing the site, although would support as a rural exception site), HD13 (will only deliver 4/5 homes).

Further SDNPA concern was expressed about the risk of significant over provision of housing in Findon, should the the two Plans (an adopted LP and made UFNDP) both include housing site allocations and be held not to be in conflict. The SDNPA obtained a legal opinion that should the UFNDP be 'made' following a successful Examination and positive Referendum, after the LP had been adopted, the UFNDP policies would 'prevail' as they were in the latest of the two Plans, but this would only apply if the UFNDP was held to be 'in conflict' with the LP and this may not necessarily be the case just because the two Plans allocated different housing sites. Developers in particular may seek to obtain planning consent on all the sites which may result in the unwelcome over provision of new housing in Findon. This legal opinion is

however somewhat equivocal but does confirm representations made by the SDNPA officers to the Working Group during discussions at an earlier stage.

The objection 'in principle' to HD10 and HD11 however reflects a difference of professional planning opinion on the 'poor connectivity' of the sites to the main part of the settlement, or not, between the SDNPA on the one hand and the Working Group's planning consultant and community on the other hand. The thrust of the Working Group and community view is that the two sites are reasonably well connected to the main part of Findon (see 8.3 below)

Of equal significance is a difference of professional opinion on the landscape sensitivity and landscape value of the two sites. This difference of professional opinion arises because the SDNPA SHLAA assessments give unjustified weight to a 'poor connectivity' rating in the landscape assessment and give insufficient counterweight to the relatively low local landscape sensitivity and the lack of any identifiable historic, cultural and heritage value at these two 'dry valley bottom' locations.

## 8. HOW THE MAIN ISSUES HAVE BEEN CONSIDERED

8.1 The more detailed Working Group responses to the Reg 14 Consultation comments are listed in a separate document included in the Evidence Base.

8.2 The main issues raised in the Reg 14 consultation that were identified as needing further consideration before the Reg 16 submission was finalised have been discussed with the SDNPA and are addressed in the Regulation 16 Submission version of the UFNDP, now known as FNP Update 1. The main issues are:

### 8.3 *Connectivity of HD10 and HD11*

The south west end of Findon is within a desirable walking distance (400 metres) of the garden centre and restaurant, the southern end of the High Street where the Black Horse and restaurant and a small parade of shops are located and is within an acceptable walking distance (800 metres) of the The Square where the Gun Inn, the Village House, two restaurants, the community store, butchers and an antiques shop is to be found. The village hall, pre school and Findon Manor hotel, bar and restaurant are also found in the High Street between the Square and the southern end at the Black Horse.

Sites HD10 and HD11 are within 250 metres of bus stops on the A24, going north and south, which are used by two different bus routes, the no 1 which diverts of the A24 into the High Street and the no 23 which travels north and south on the A24.

Before the route of the A24 was diverted away from the High Street and constructed as a two carriageway with green central reservation 'by pass' in 1939, the High Street continued south as the A24, connecting the Nepcote hamlet to the east and the south west end of Findon, which includes sites HD10 and HD11, to the rest of the village. The 'by pass' was routed through part of the historic parkland associated with Findon Place which had the effect of creating a physical 'challenge' on the Monarchs Way route from the village to the medieval St John the Baptist church as well as on the High Street connection to the south west end of Findon.

The Findon settlement, which since 1939 has grown significantly to include the former lower slopes of downland pasture to the east of Horsham Road (the former Findon Farm) and infilling to the Nepcote hamlet, still includes the south west end (the Quadrangle, Sites HD10, HD11, the garden centre and houses along the west side of the A24). This south west end is clearly a distinctive part of Findon, separated by a former local gap from the more suburban Findon Valley settlement to the south.

FNP Update 1 includes the reinstatement of a Local Gap, following a review of the primary purposes of local gaps which resulted in a change to the land area included in the Gap. It is given protection by the introduction of a new policy, ES1, the earlier version of the local gap having been removed as a policy from the Submission FNP, following recommendations from the Examiner that it could only be included as a FNP 'Community Aspiration' as the blanket land area then included would unnecessarily restrict consideration of potential housing site allocations in that part of Findon.

Considering the impact on local landscape character, sites HD10 and HD11 are dry valley bottom locations which sit comfortably with the very predominantly similar contour setting of most of Findon. The allocation sites are therefore visually, environmentally and in landscape character well connected to, and are part of, the Findon settlement.

Direct access onto the A24 from sites HD10 and HD11 also gives good connection to the main road network without having to use, or have any adverse impact on the historic rural roads which link the main eastern part of the village to the A24.

#### 8.4 *Landscape value and landscape sensitivity of HD10 and HD11 and the prevention of coalescence between Findon village and Findon Valley;*

It is only the SDNPA that contend that landscape value and sensitivity is 'medium to high', the same assessment for the SDNPA proposed location SD71 on the upper slopes of pasture downland east of Elm Rise. The SDNPA LCA is not a fine grain, local

landscape characterisation and further, clearly states that the landscape value and sensitivity rating derives from the significant weight they have given to their contention that sites HD10 and HD11 are poorly connected with the main settlement of Findon. The SDNA LCA, further, gives no counterweight to the relatively hidden, dry valley bottom location of the sites or their lack of any historic or cultural heritage value.

The fine grain local landscape characterisation assessment undertaken by the Working Group's planning consultant concludes that sites HD10 and HD11 are of 'medium' landscape sensitivity and landscape value and have no identifiable local historic or local cultural heritage value to Findon', in contrast to the allocation sites proposed by the SDNPA in the Submission version of the Local Plan.

The primary purposes of a local gaps are to retain distinctiveness of settlements and prevent coalescence. Although the now 'out of date' Arun DC Local Plan included a Local Gap at the south west end of Findon, this was a blanket designation that covered the entire area, including more than 50 houses, the garden centre and some B8 uses at the Lister Yard.

Sites HD10 and HD11 are located between the existing houses (the Quadrangle and those with frontages to the A24) and the main part of Findon. The significant landscape area comprising pasture, paddocks mature trees and hedges which forms the Local Gap to Findon Valley lies to the south of the existing houses (the Quadrangle and those with frontages to the A24). This area of landscape does properly address the primary purposes of retaining distinctiveness of settlements and preventing coalescence and is therefore proposed as a designated Local Gap, as a new policy, ES1, in FNP Update 1, to give a higher level of protection. Unlike the previous, now out of date, 'blanket' approach to the area designation of a local gap, the UNP policy focuses on the primary purposes on achieving distinctiveness and preventing coalescence, which results in a reduced area of land included in the new Local Gap.

#### 8.5 *Access at the junction(s) from the south west end of the village at the Quadrangle and the Garden Centre, with the A24;*

Although WSCC, the Highway Authority and the neighbouring highway authority used by the SDNPA to assess highway implications of potential sites during the SHLAA process, considered that the existing adopted access to the A24, via the Quadrangle, was acceptable for a proposed housing development at HD11, it is experienced locally as a challenging junction with the A24, primarily because of the 50 mph speed limit that applies on this part of the A24.

The Working Group and FPC however have successfully lobbied WSCC into

undertaking a traffic speed survey on the A24 at Findon, the first stage of bringing forward a reduction in speed limit to 40 mph. The survey has been completed and the results have allowed WSCC to bring forward a speed reduction scheme for consideration for implementation in the 2020/2021 infrastructure programme. The new 40mph limit will extend from the parish boundary on the A24 at Bost Hill to the High Street access at the Black Horse. This 'Community Aspiration' in the 'made' FNP is retained in FNP Update 1 and when implemented will alleviate the challenges at the Quadrangle junction with the A24 and enhance the ease of connectivity of HD10 and HD11 with the southern end of the High Street and the main part of the village.

The masterplan for the development of sites HD10 and HD11 also proposes a new non adoptable local access lane from HD10 and HD11, which links with the 5 metre wide garden centre service road (in the same ownership as site HD10) on to the existing access from the garden centre to the A24, almost opposite the entry to the southern end of the High Street. This will provide an alternative route from HD11 to the A24 opposite the southern end of the High Street, a quieter, easier, enhanced connection between the south west end and the main part of Findon.

#### *8.6 Potential loss of some open green green space at the Oval;*

The policy for site HD12 includes a requirement to address a parking shortfall that will arise for residents in and around the Oval and Old Cottages who currently have to 'on street' park on the existing access road to Nightingales and HD12. The number of new parking spaces required however will only be around 8 to 10 and the owner of HD12, Arun DC, the housing authority, also own a small grassed area, near the former fire station end of the Nightingales access road which they have indicated they will make available for parking for 4 to 5 cars, in association with an allocation at HD12.

This will leave a requirement for parking for only 4 to 5 cars at the road end of the green open space that runs up the middle of the Oval. This will result in only a small loss of the large open green space. The policy also allows these parking spaces to be located at another location, in and around the Oval, much of which is still owned by Arun DC, following a pre planning application local consultation.

#### *8.7 Loss of opportunity to alleviate existing historic parking shortfall in and around Nightingales, Old Cottages and The Oval if HD12 is only allowed to come forward as a 'rural exception site'*

The policy for HD12 is a housing allocation, not a 'community aspiration' that the site comes forward as a rural exception site. The housing allocation policy in the FNP Update 1 will not only deliver affordable housing in Findon that will be Submission LP policy compliant in tenure and size mix but will deliver more than a LP policy compliant number of genuinely affordable homes, to meet local need, without

requiring HD12 to provide 100% affordable homes (a rural exception site requirement in the LP).

As a housing allocation, development of site HD12, by Arun DC, will facilitate the provision of the current parking shortfall which results in on street parking on the access to HD12, by allowing up to three market houses to be included in the development.

8.8 *Risk of over provision of housing in Findon by developers and landowners if the LP and UFNDP are not held to be 'in conflict' over housing site allocations;*

The Working Group, on balance, are of the view, that although the FNP Update 1 cannot be 'in conflict' with strategic policies in the submission or adopted Local Plan, the housing site allocation policies in the FNP Update 1 are inherently 'in conflict' with the two housing allocation policies for Findon, in the Local Plan, because FNP Update 1 is absolutely clear that the housing site allocations and associated policies in the FNP Update 1 are fundamentally different site allocations to meet the housing provision for Findon and are not additional allocations required to meet any additional housing need, which has not been identified, in any case.

FNP Update 1 housing site allocations are fundamentally different from the Local Plan housing site allocations for Findon because they are at significantly less landscape sensitive locations, are at significantly less sensitive local historic and cultural heritage locations, do not need to access the main road network via historic rural roads, have strong community support demonstrated by a high locational preference survey response and local consultation, are viable and will deliver a greater number of LP policy compliant genuinely affordable homes.

The Working Group do however acknowledge that bringing forward an FNP Update 1 that includes different housing site allocations to a submission or adopted LP is a move into uncharted territory, but nevertheless this should not preclude the community from submitting a Reg 16 FNP Update 1, nor the LPA from appointing an Examiner, nor the community from having the opportunity to consider an Examiner's Report and Recommendations with the LPA and seek a further legal opinion at that time.

8.9 *SDNPA specific concerns on all the housing site allocations HD10, HD11, HD12 and HD13;*

Concern on HD10 and HD11 primarily revolves on the contention that the locations are not well connected to the main part of Findon. This is addressed in the detailed response in 8.3 above which argues the contrary, that the sites have always been part

of, and are closely identified with Findon and the A24, which was only re routed away from the High Street and Horsham Road in 1939.

In 2015, during the initial stages of the FNP process, the SDNPA themselves put forward the garden centre and surrounding location for consideration as a housing allocation site for up to 50 houses. Allocation site HD10a is an available, but unused part of the garden centre land and includes part of an adjoining network of paddocks, while HD10b also adjoins this unused part of garden centre land. Allocation site HD11 also adjoins this land. The SDNPA have been unable to give any justification for their change of view about the connectivity status of this part of Findon, or its capacity to absorb new housing development with minimal harm to the landscape, since 2015 when they were suggesting the site for housing development in Findon.

Concern on HD12 primarily revolves around the additional costs of developing the site, in particular FNP Update 1 policy for HD12 which identifies a requirement for an upgraded electricity sub station to be located at ground level, not overhead like the existing supply, as an environmental enhancement; for WHO standards to apply for noise levels in habitable rooms; and for the provision of landscaped off site parking spaces to address a shortfall in the locality which results in residents parking 'on street' on the access road to HD12.

The SDNPA however have been promoting HD12 as a rural exception site where submission LP policy would require 100% affordable homes to be delivered. A small number of market houses within the development would however generate the funds, through the sale, to facilitate the provision of the above mitigating features included in the FNP Update 1 policy. A scheme requiring 100% affordable homes would not be able to meet the cost of provision of the mitigating features and would result in homes of a lower specification, a more environmentally damaging overhead electricity sub station, and exacerbate on street parking on the access road to Nightingales and side HD12.

The HD12 housing site allocation will enable the mitigating features to be delivered by allowing up to three market homes to be included in the development and which will still deliver more genuinely affordable homes than required by the LP affordable housing policies for allocation sites.

Concern on HD13 solely revolves around the capacity of this brownfield site within the current settlement boundary to deliver only 4 or 5 homes. NPPF guidance however specifically points out that housing sites in rural settlements are likely to be smaller than the usual SHLAA calls for sites which consider only sites with a capacity for more than 5 houses, and goes on to state that this should not prevent smaller sites in rural settlements from being included as housing site allocations in development plans.

HD13 is well connected to main part of Findon, is very close to Nightingales, a form of sheltered housing for older residents with a local connection. Its allocation presents an opportunity to provide smaller homes for similar residents; perhaps in the form of new flats within a vernacular farm building arrangement; which would closely reflect a particular local housing need identified in the Findon Housing Needs Survey undertaken by AIRS, the rural housing enabler for Sussex, in November 2013.

8.10 *Loss of part of paddock for HD10 allocation and loss of wildlife habitat and former private allotments for HD11 allocation.*

8.11 HD10a, as proposed, only involves of the loss of a 5 metre wide strip of the network of paddocks which are close to the garden site. Unlike the LP allocation site on paddocks east of Elm Rise on the the upper slopes of open downland pasture, which have been used for many years by a long established local equestrian business in connection with the breeding and bringing on of horses and ponies, HD10a is a discrete dry valley bottom paddock that is used for the grazing of horses owned by leisure riders and only involves the loss of a very small strip of the paddock at its northernmost boundary next to HD10b, the B8 storage land and the main part of HD10a which includes the redundant agricultural building and stabling.

FNP Update 1 seeks to ensure that paddocks which are vital to the continuity of the racehorse training and associated equine business and activities, which have been, and still are one of the main sources of local employment, as well as carrying on the unique equine cultural heritage of Findon, are not lost through new housing development.

Although paddocks used primarily for the grazing and keeping of horses owned by leisure riders are afforded less protection, FNP Update 1 acknowledges that support for leisure riding in a rural settlement with very good access to downland bridleways is important for both the community and visitors to the National Park and if at all possible should also not be lost through new housing development if the housing provision can be met by the allocation of other sites.

Mindful of this, further discussions have been held with the owner of the garden centre, its adjoining land and the paddock(s) and the owner of a small former paddock, part of the adjoining B8 storage land. These have resulted in the extent of the HD10 allocation site area, as originally included in the Pre Submission UFNDP, no longer requiring a more significant part of the paddock(s). The boundary of HD10 has been amended to include only the area of land between the garden centre outdoor storage area and the network of paddocks and a 5m metre strip of the paddock(s), now allocated as HD10a with the inclusion of the small former paddock on the B8 use land now allocated as HD10b, as referred to in earlier paragraphs.

The stabling facilities that are currently located on the HD10a site are to be relocated at the northern boundary of the main paddock which forms the boundary with HD10a. This revision to the original proposed area of HD10, as HD 10a with the inclusion of the adjoining HD10b results in a net increase of three dwellings which is justified on capacity assessment, as a buffer for the Findon housing provision and on the full retention of the network of 'leisure' paddocks.

Allocation HD11 only includes housing on part of the site with a policy requirement that a wide green band following the curve of the green verged A24 is restored as allotments for community use. The site lies within a wider area of Protected Notable Species, an environmental designation that covers all the settlement edge locations around Findon, but the inclusion of a significant area of allotments, the adjoining network of paddocks and the nearby heavily wooded ground rising to West Hill will ensure the particular character of the wider area PNS status will be maintained around this part of Findon.

## 9. SUMMARY

- 9.1 This Consultation Statement sets out how engagement with the community, landowners, the LPA and other consultees has been undertaken in accordance with Regulation 14 and Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, as amended.
- 9.2 Key issues have been identified that have influenced and shaped the new housing site allocation policies in FNP Update 1, both in the Regulation 14 and Regulation 16 Submission version documents.
- 9.3 In line with Regulation 15 (2) (a) and (b) this Consultation Statement summarises all responses received as part of the consultation and engagement process and shows how the housing site allocation policies in FNP Update 1 have changed and evolved in response to consultation feedback. Where the FNP Update 1 has not been changed as a result of representations made at Regulation 14 stage, an explanation has been provided.
- 9.4 This Consultation Statement demonstrates that FNP Update 1, with housing site allocations to meet the housing provision for Findon, has been the subject of robust consultation and satisfactorily meets the requirements of the Regulations.
- 9.5 Although not part of the consultation requirements for FNP Update 1, the Working Group and FPC have engaged positively with the SDNPA Local Plan Inspection, both by written representations and appearances at one of the Hearings, to present the case

that the two housing site allocations for Findon in the Submission Local Plan are considered unsound and should be withdrawn, on the grounds that;

- a) FNP Update 1, with different housing site allocations to meet the housing provision, is now well advanced;
- b) it includes housing site allocations that are not landscape sensitive, being discreet dry valley bottom locations that are also not of any local historic, cultural, or heritage value;
- c) it includes housing site allocations that do not need to access the main road network by using historic rural roads;
- d) it has been subject to full consultation and sequential locational preference surveys that attracted a high response rate; and
- e) the allocation sites and policies are sustainable, viable, available and will deliver a greater number of genuinely affordable homes which better reflect local housing need over the period of the Plan;

unlike the Submission Local Plan housing site allocations.

- 9.6 The Local Plan Inspector's Report is not anticipated to be issued until mid to late June 2019 which is likely to be during the period of the Reg 16 Consultation on the UFNDP.