

Subject: SOUTH DOWNS NATIONAL PARK LOCAL PLAN REVIEW

Dear SDNPA colleagues

**Consultation response to the Local Plan Review from CPRE Sussex, the countryside charity**

I am delighted to respond to the current consultation on behalf of CPRE Sussex, the countryside charity.

**Policies**

We felt that the previous iteration of the Local Plan was already strong, and we are pleased to see that, in relation to the plan policies, where amendments have been made, they largely strengthen the Plan still further.

The continuing focuses on landscape protection, habitat improvement, ecosystem services, climate change mitigation and adaptation, and affordable housing within thriving communities, fit very well with CPRE Sussex's vision for the South Downs.

We support and endorse the detailed comments on policies made by our colleagues in CPRE Hampshire, and as such have limited ourselves to a small number of additional comments on specific policies.

In particular, we welcome:

- **Climate** We welcome the changes here, and in particular the much higher new-build design standards.
- **Nature recovery** We welcome the tough approach to water neutrality and protection of SPAs and SACs. We support the idea of a higher BNG target, though we would defer to groups such as the Sussex Wildlife Trust, RSPB and Woodland Trust as to the exact formulation.
- **Water** We welcome the much greater integration with nature recovery and climate adaptation policies. The proposed policies recognise the reality of the increasing levels of threat posed by climate change-accelerated flooding, and the need to manage water more effectively.
- **Homes** At a time of crisis in housing affordability, we particularly welcome the firmer approach on affordable housing and the specific focus on homes for social rent. A vibrant countryside relies on a wide variety of people being able to afford to live in our villages, and addressing these local needs is where development should be focused.

While we support the thrust of **Strategic Policy New 2: Designated Sites and Hierarchy**, we propose some changes to the wording.

As David Attenborough has said in the past, “if we damage the natural world, we damage ourselves. We are one coherent system.” The State of Nature report revealed that the UK is now one of the most nature-depleted countries on Earth.

As such, in paragraph 1.a)ii ....“unless it can be demonstrated that there are no alternatives to the proposal; there are imperative reasons of overriding public interest why the proposal should nonetheless proceed; and adequate compensatory provision is secured” should be omitted.

This policy deals with Internationally Protected Sites; we question how the adverse impact on the integrity of such sites could genuinely be compensated? And what about the future generations?

The same applies to b)ii:...“unless the benefits of the development, at this site clearly outweigh the likely impact to the notified features of the site and any broader impact on the network of nationally protected sites.”

c)i. "Development proposals which results in the direct or indirect loss or deterioration of irreplaceable habitats .....will be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists;”

d)ii. ....“unless exceptional circumstances outweigh the adverse effect are clearly demonstrated.”

We are concerned that this provides an insufficient ‘hard-edged’ safeguard, to protecting/conserving these sites of international, national and local significance. Once is something lost it can’t be replaced.

Notwithstanding the strength of the proposed policies overall, we feel that there is one area where policies are sorely lacking: policies to enable and control the development of infrastructure to support the production, processing and distribution of local food. As the landscapes of the Park are significantly shaped by food production and farming, as food security is an important priority in a changing climate and as food and farming play an important role in the economy of the South Downs, we feel this is an important omission. The Plan should enable sustainable and regenerative methods of farming, which support nature recovery, to flourish, and recognise the threats and opportunities around local food infrastructure - e.g. the existence of a sole (and precarious) abattoir in all of Sussex, given the importance of conservation grazing to landscape and nature, or the potential for peri-urban horticulture in a context where the UK is *heavily* reliant on imports.

We suggest that the Plan would benefit from further policy development in this area, and we endorse the comments of the Brighton and Hove Food Partnership in terms of the suggested direction of travel.

### **Site allocations**

Overall, we feel that the proposed sites are well-judged, though in a small number of cases we cannot support the proposals, and we focus on those here.

### **Policy SDXX: East Street Farm, Amberley (HO037-038)**

The proposed sites have a prominent location at the centre and southern edge of the settlement with local and distant intervisibility.

There are in the village at least 3 dwellings that predate 1500 and many more dating from the 17<sup>th</sup> and 18<sup>th</sup> centuries (65 Grade II Listed Building within Parish) and Amberly Castle (crenelated in 14<sup>th</sup> century). Policy SD12: Historic Environment and Cultural Heritage states development proposals will only be permitted where they conserve and enhance the historic environment and cultural heritage, including through the safeguarding of heritage assets and their setting.

For the above reason the location of the proposed sites is not suitable for the development. In addition, the number of suggested dwellings extends the needs and capacity of the village. A study of Local Study Needs identified a small number of affordable houses in the Parish and for smaller units for older people. There are poor bus services, problems with parking, pedestrian safety, sewage system failures, energy vulnerability, there are no medical facility.

The Amberley Society in their objection point out the impervious nature of the underlying dip slope bedrock on these fields which means that these fields are usually waterlogged in winter, especially with additional water run-off associated with the Hurst Cottages development to the north of the site, and are prone to flash flooding.

What is more, the land has a chalk stream running across the middle field (as confirmed by a Natural England map and the Western Sussex Rivers Trust). There are only about 200 chalk streams in the world, they are unique. Reviewed Policy SD17, par 2c)i requires that special regard will be given to the conservation, enhancement and restoration of chalk stream priority habitat.

The only feasible site is **HO39** site (LAA Reference) as a continuation of the existing ribbon development alongside Turnpike Road (B2139), 9-10 dwellings, speed limit would be crucial.

**Policy SDXX: Land east of A286: and north of Mill Lane, Cocking (CH199)**

The site is entirely outside of Settlement Boundary in a prominent, gateway position on the northern edge of Cocking, open to the countryside with a Local Nature Reserve to the east and the Cocking Conservation Area and listed buildings to the south and west

There would be an adverse impact on the protected landscape due to open and extensive visibility of the site. The proposed development would be detrimental to the designated heritage assets and their settings.

**Policy SDXX: Land West of The Street, Lodsworth (CH215)**

The isolated position with a farmstead character of Old Langham Farm. This location is unsuitable for development. An isolated farm is a feature of the countryside, but an isolated line of dwellings would be contrary to NPPF, paragraph 84, which requires decisions to avoid the development of isolated homes in the countryside.

The Parish Design Statement identifies key features in the parish that need to be protected including important viewpoints, open spaces and characteristics of settlements. Within the parish there are over 60 Grade II listed buildings as well as other buildings of particular or historic interest.

Approached by a gently ascending, winding lane with high banks, the village itself stretches northwards surrounded by rolling countryside.

This isolated development would be harmful to the surrounding landscape and would spoil the views whilst approaching the village from south, contrary to paragraph 187 of the NPPF.

**Policy SDXX: Land west of Village Hall, Rogate (CH236)**

This site is outside of settlement boundary within a prominent gateway position on the northerly approach to Rogate, widely exposed to open fields to the north and west.

Whilst the main body of village is situated on the southern side of A272, all heritage assets are on the northern side (in the immediate neighbourhood of the proposed site) or along the main road of the village. There is a temporary development on the south-west end.

The proposed site would be a heavy addition to the end of the village where development density currently, and appropriately, decreases towards the edge of the built-up area, packed with designated heritage assets adjacent to the open fields. The proposed development would have no connection with neighbouring Conservation Area.

Several views of special local significance within the parish have been identified in the Neighbourhood Development Plan (policy BE2(h)) to ensure that the character of Rogate

and Rake that is recognised and loved by its residents is retained. One of them, 14 Rogate Village (Footpath 1160 looking Southeast), is facing directly to the proposed site.

Policy SD6: Safeguarding Views states that development proposals will only be permitted where they preserve visual integrity, identity and scenic quality of the NP, in particular by conserving and enhancing key views.

In relation to the other allocated sites, we also note:

**Policy SD56: Shoreham Cement Works**

In relation to the Shoreham Cement Works site, we are disappointed not to see a more prescriptive approach for this very large site, especially given the extensive response to the previous consultation. The site was converted from an opportunity area to a full allocation, taking into account the evidence and consultation responses to the Shoreham Cement Works draft Area Action Plan, but we are unclear what the responses said, or exactly how this has informed the policies for this site.

We would like to see a more detailed masterplan for this site, to give greater guidance to developers.

**Policy SDXX: County Hall, St Anne's Crescent, Lewes (LE039)**

Care is required secure the potential of this site; the current building sits poorly in the street scene.

**Policy SDXX: Alfriston Court, Sloe Lane, Alfriston (WE014)**

This allocation is agreeable if a high quality of design and landscaping is secured. Taking into consideration Alfriston Court Care Home (27 units), a substantial 2-storey building with a habitable roof, the new dwelling with a capacity of 25-30 units would unlikely fit to the available space without causing a harm to this sensitive and prominent setting within the National Park, particularly visibility from the Cuckmere River corridor.

**Policy SDXX: Land East of Coombe Crescent, Bury (CH003)**

The site allocation is agreeable; sensitive design is needed since not every part of this site is suitable for new development.

**Policy SDXX: Land rear of 71: East End Lane, Ditchling (LE148)**

Proposed number of dwellings is too ambitious taking into consideration shape of the plot and the low-density pattern of surrounding development with substantial houses sitting in their spacious plots.

**Policy SDXX: Land at former Easebourne School, Easebourne,(CH203)**

Due to the low-density pattern of surrounding development, existing vegetation on the site and the position on the edge of settlement, 5-6 dwellings would be more appropriate for this location.

**Policy SDXX: Land west of Budgenor Lodge, Easebourne (CH206)**

A sensitive development would be suitable in this location; however, it is not clear how this site can be accessed.

**Policy SDXX: Land at Hawksfold, Fernhurst (CH026)**

This is a sensitive location with high visibility; care will be needed in design.

**Policy SDXX: Land east of Lodge Lane, Keymer, Hassocks (MI014)**

Taking into consideration the pattern of surrounding development, adjacent CA and the open land to the east, south and north and flooding, we suspect a maximum 20 dwelling would be feasible.

**Policy SDXX: Land at Beaumont, Wellgreen Lane, Kingston (LE118)**

Trees and hedgerows should be maintained.

**Policy SDXX: Audiburn Farm, Ashcombe Lane, Kingston (LE124)**

It is not clear how the site would be accessed.

**Policy SDXX: Land behind the White Hart, 55: High Street, Lewes (LE103)**

Not clear if it supposed to be a replacement of an existing annex.

**Policy SDXX: Land at the rear of 49-55: St Anne's Crescent, Lewes (LE114)**

Given the importance of incorporating the numerous mature trees within the site into scheme design, we suspect that 8 dwellings may not be appropriate for this location, with perhaps 6 more plausible.

**19 Policy SDXX: Springman House, 8 North Street, Lewes (LE133)**

It is not clear from the policy wording and map, if the proposed 16 dwelling would have any negative impact on emergency services based at the location. It would be helpful if this could be clarified.

**Policy SDXX: The Shelleys Hotel, 136: High Street, Lewes (LE134)**

This is an excellent approach towards such a substantial and attractive building like Shelleys Hotel and its setting. Ideally, the garden would be kept as a whole, and some of it made accessible to the public.

**Policy SDXX: Land east of Pitsham Lane, Midhurst (CH165)**

The number of dwelling and suitable sensitive pattern should be tested by masterplan alongside with street-scenes.

**Policy SDXX: Former Bus Depot, Pitsham Lane, Midhurst (CH218)**

The site is on the very edge of the western settlement boundary (prominent corner position, widely open to countryside) and as such low-key development should be considered.

**Policy SDXX: Land adjacent to The Grange Car Park, Midhurst (CH222)**

If well-designed, it would complement surrounding area.

**Policy SDXX: Land west of Valentines Lea, Northchapel (CH074)**

Due to prominent position adjacent to settlement boundary to the east and the ancient woodland to the west the low key-development should be proposed and the portion of land adjacent to settlement boundary would be appropriate for a lower-density pattern of development.

**Policy SDXX: Land at Rotherbridge Lane, Petworth (CH092/ CH093)**

Prominent gateway position, however, harnessing a sensitive approach, a new development would soften sharpness of the southern settlement boundary.

**Policy SDXX: Land off Steepdown Road, Sompting, Adur (AD001)**

The A27 to the west of the proposed site is separated only by an open field. As such soundscape analysis should be required – and the design adjusted accordingly - to avoid exposing future tenants to the noise from the highway.

Thank you for taking our comments into consideration. We would be delighted to discuss the issues further, and we hope to see our comments reflected in the Regulation 19 proposal.

Yours sincerely

**Paul Steedman**

Director, CPRE Sussex