



MATTER 1 EXAMINATION STATEMENT

EUROPEAN PROPERTY VENTURES
(EAST SUSSEX)

REPRESENTOR REP/37

VISION AND OBJECTIVES



This Statement for Matter 1 will seek to address the Inspector's Questions identified below:

Is the Plan based on an appropriate Vision and appropriate Objectives, with reference to established legislation and guidance governing National Parks?



Matter 1 – Vision and Objectives

1. Claremont Planning Consultancy Ltd previously provided responses to the Council's emerging Local Plan on behalf of European Property East Sussex (EPV) to seek to boost housing requirements and recognise the need to ensure housing delivery within South Downs National Park. Specific to this is the possibility of meeting cross boundary need via provision of boosting housing numbers within Lewes District and how this relates to the provision of infrastructure improvements in and around settlements, such as Peacehaven.
2. Addressing cross boundary issues are central to an effective Local Plan and also form part of the statutory requirement of a Local Planning Authority's duty to co-operate so that need can be addressed across local authority boundaries. In the case of Lewes District and Peacehaven, the unmet need of the District and the SDNPA, is pertinent to the emerging plan and how it is able to engage and accommodate this need. In so doing, the plan must therefore make appropriate provision to deliver sufficient housing allocations and improvements to infrastructure that go above and beyond the recognised need in the SDNPA.
3. The site at Lower Hoddern Farm, Peacehaven falls within the South Downs National Park designated area but is immediately adjacent to the town of Peacehaven which is outside the Park and within Lewes District. Its location within the Park area affords it significant weight in its protection so as to achieve long term preservation of the unique and highly valued environment and landscape of the National Park. This protection is not specific to the Lower Hoddern site, rather generally applying due to its location within the Park, with the weight of the ongoing preservation of the Park balanced against the need for growth and development to meet the identified need of the National Park Authority area. Thus, a careful balance must be struck between the preservation of the intrinsic landscape, ecological and aesthetic value of the Park and sustainable growth that takes this into account. Whilst the Vision and Objectives of the Plan make some consideration of this, they fail to recognise suitable, sustainable locations within the Park that are of a less intrinsic value that have the capacity to accommodate growth.
4. The plan fails to adequately capitalise upon opportunities to deliver development in such lesser valued locations and take advantage of the opportunity that development provides in enhancing the Park. Both through improvements to the landscape setting where modern farming has detrimentally affected the landscape setting of the park, as well as enhancements through improved public access. It is advanced on behalf of EPV that locations with limited contribution to the Park's setting, particularly along its peripheral edges, have the potential for development. The site promoted by EPV at Lower Hoddern Farm, Peacehaven is just such a location, but the format and content of the proposed Visions and Objectives do not provide any opportunity for the consideration of such sites. In order for the resulting Plan to be effective in meeting development needs, addressing cross-boundary influences to an appropriate level and consistent with delivering improvements to the function and purpose of the designated National Park, the reconsideration of development delivery in low landscape value areas of the Park must be included.
5. The revised National Planning Policy Framework (the Framework) in paragraph 172 makes it clear that the extent of development within the designated area of National Parks should be limited to ensure conservation of the landscape and natural beauty of such designated areas.



However, the Framework acknowledges that such developments which could be deemed as overly harmful should be balanced against the need for the development and its impact on the economy; the scope of delivering this development outside the designated area and whether the effect on the environment and recreational opportunities can be appropriately moderated. It is advanced that the site at Peacehaven under control by EPV E Sussex demonstrates an opportunity in meeting the identified need within the SDNPA, it provides a development location that will cause lesser harm to the National Park and takes full advantage of its location at the very edge of the National Park area.

6. It is of significant importance that the National Park is conserved as far as possible and as such development should be directed towards those locations which can accommodate development without resulting in detrimental harm to the Park. This would intimate the identification of lower contributing areas is advanced to identify the most suitable locations. The site at Peacehaven is demonstrated to be a less sensitive location of the Park due its farmed nature and lack of landscape characteristics that are inherent to the Park; and as such provides an alternative location for development away from the more sensitive locations of the Park. It also takes advantage of its location at the edge of Peacehaven itself which falls within Lewes DC, this allows for the opportunity to deliver housing to meet the need of Lewes as well as the pressure of the need arising from the SNDPA. The Lower Hoddern Farm site therefore demonstrates a realistic potential to meet the cross-boundary need of two authority areas without triggering detrimental harm to the landscape of the National Park and actually providing tangible benefits.
7. Development to the east of Peacehaven also demonstrates a sensible option for the practical built extension to the settlement. To the west, Peacehaven is in close proximity to Saltdean and Telscombe, with only a narrow area of undeveloped land separating the settlements from each other. Development towards the west would erode this already narrow gap and will inevitably lead to coalescence of the settlements, which would significantly undermine the wider landscape context and setting of the National Park and its relationship to the coastline. Whilst national policy affords significant weight in the protection of National Parks themselves from extensive development, harmful development at their boundaries can substantially affect their wider setting. As such the erosion of the separation between settlements along the East Sussex coast will be detrimental to the setting of the National Park. Focussing new development to the north and east of Peacehaven will not result in coalescence and will continue to preserve the setting of the National Park by limiting the urbanising effect on the local landscape. By preventing the settlements along the coast from coalescing, the identity of each settlement can be conserved and in turn the setting adjacent to the South Downs National Park can be achieved.
8. Furthermore, landscape assessments of the site at Lower Hoddern Farm have demonstrated that it has capacity to accommodate development without causing undue harm to the wider landscape of the National Park. The Framework recognises that National Parks are especially valued for their natural beauty and environmental significance, however the Lower Hoddern Farm site, as being promoted by EPV East Sussex, does not demonstrate such significant value as would be normally attributed to a National Park. The Plan therefore should make appropriate consideration for the site and should be reflected in the Vision and Objectives of the Plan that makes due acknowledgment of areas of the Park that are of a lesser value and so able to accommodate growth to meet the need of the Park and of those nearby authorities such as Lewes.



9. Notwithstanding the above, it is acknowledged that the edge of park location of the site is nonetheless sensitive to some development and therefore any proposal on the site would need to incorporate some extent of landscape mitigation to ensure that the setting of the Park is protected. Any mitigation strategy at the site will also demonstrate a softening of the settlement edge through planting and the provision of new vegetation. At present, the settlement edge is harsh, with no transitional or indicational areas of land that mark the end of the settlement at the start of the open countryside, and in turn, the National Park. The site at Lower Hoddern Farm would be able to provide a new, softer landscaped edge to Peacehaven and allow the settlement to more appropriately relate to the National Park. By taking advantage of the existing built form and incorporating it into any proposal as a new, but limited extension to the settlement, a more sympathetic edge to Peacehaven can be provided and in turn reinforce the beginning of the National Park beyond the boundary of the settlement itself.
10. The Vision and Objectives of the new Local Plan for the SNDPA needs to make appropriate consideration of development within the National Park towards those areas that are less sensitive to development and those which are able to accommodate growth to meet the long term requirements of the Plan. Sites such as at Lower Hoddern Farm can provide options for growth that can complement the aspirations of the Plan but also simultaneously demonstrating soundness, effectiveness and compliance with national policy.
11. The South Downs National Authority is reliant on cross-boundary growth given that they are not statutory obliged to achieve an OAN. However, as the Authority must identify growth and ensure that they are able to meet the needs of its residents and aspirations of growth, sites such as east of Peacehaven is able to demonstrate growth within the National Park itself, but at a boundary with a neighbouring authority which will be able to demonstrate cross-boundary provision. Inclusion of the site in the Plan will ensure that its implementation is effective and sound in terms of allowing for appropriate development and growth that does not cause detriment to the preservation of the intrinsic value of the National Park.
12. Claremont Planning have demonstrated that the plan cannot be found effective or sound without further modification given the inadequacies surrounding the identification of strategic growth locations at Peacehaven.

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