

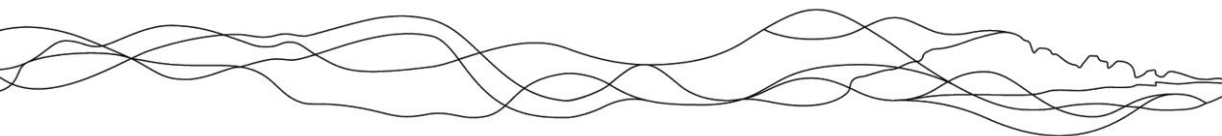


Sussex
Wildlife Trust



Statement of Common Ground between the Sussex Wildlife Trust and the South Downs National Park Authority in regard to draft Allocation SD64: Land South of London Road, Coldwaltham

08 November 2018



Contents

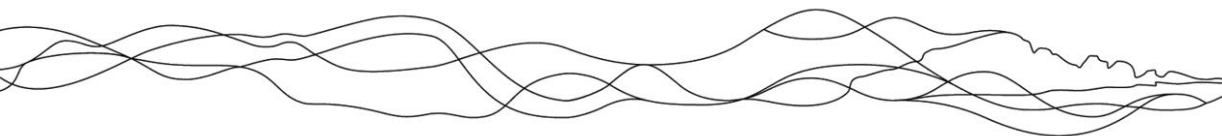
1. **Introduction**
2. **Context**
3. **Purpose of this Statement of Common Ground**
4. **Land South of London Road: Coldwaltham**
5. **Key Issues**
 - a) **Biodiversity value of existing field**
 - b) **Impact on adjacent national and international nature designation sites**
 - c) **Net biodiversity gain**
 - d) **Function of retained open space**
 - e) **Meadow Management Plan**

Appendices

Appendix 1: Representation of the Sussex and Hampshire & Isle of Wight Wildlife Trusts to the Pre-Submission South Downs Local Plan

Appendix 2: Policy SD64: Land South of London Road, Coldwaltham incorporating the proposed main modifications and minor edits with explanatory text.

Appendix 3: Outline Meadow Management Plan between the SSDNPA and the Barlavington Estate.



Introduction

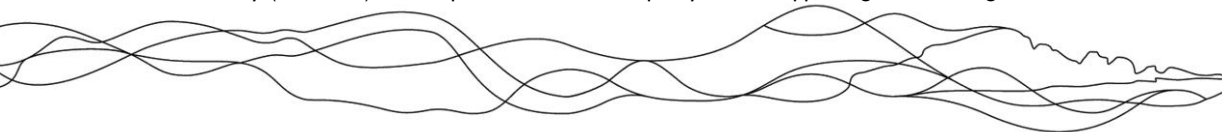
- 1.1 This Statement of Common Ground (SCG) is a jointly agreed statement between the Sussex Wildlife Trust (SWT) and the South Downs National Park Authority (SDNPA). It sets out the position and understanding with respect to key matters related to the development of draft Allocation SD64: Land South of London Road, Coldwaltham in the Submission South Downs Local Plan.

2. Context

- 2.1 Section 62 of the Environment Act 1995 requires all relevant authorities, including the SWT, to have regard to the purposes of national parks. These are:
- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area;
 - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- The SDNPA also has a duty when carrying out the purposes to seek to foster the economic and social well-being of the local communities within the National Park.
- 2.2 As a National Park Authority and Local Planning Authority, plan-making and the determination of planning applications by the SDNPA is subject to the National Planning Policy Framework (NPPF). It should be noted that for the purpose of the South Downs Local Plan examination and thus for the preparation of this SoCG, all references to the NPPF will be to the 2012 and not the 2018 version. This is in line with the paragraphs 15 to 20 of the Guidance Note from the Appointed Inspector (INSP.³) The NPPF states that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless specific policies in the NPPF indicate development should be restricted. An example of such restrictions given in footnote 9 on page 4 of NPPF is policies relating to the development of sites within a National Park. Paragraph 115 of the NPPF states that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads. The DEFRA Vision & Circular on English National Parks and the Broads is referenced in the NPPF and provides guidance to national park authorities on how to meet their purposes and duty.

3. Purpose of this Statement of Common Ground

- 3.1 The purpose of this SCG is to consider the development of the draft allocation in the Submission South Downs Local Plan known as SD64: Land South of London Road, Coldwaltham. The need for this document arose from the representation made by the Sussex Wildlife Trust, which forms Appendix I of this document.
- 3.2 The SDNPA is preparing its first Local Plan – the South Downs Local Plan (SDLP). This is a landscape-led plan, with ecosystem services (the goods and services we get from the natural environment) at its heart. The SDLP will provide a comprehensive development plan document to cover the whole of the National Park, and includes a policy to address all types of development, with the exception of minerals and waste.
- 3.3 Land South of London Road is allocated under draft Allocation Policy SD64 of the Submission Plan. A number of changes were made to the policy and its supporting text in answer to representations received during the Pre-Submission consultation. These changes are set out in the Schedule of Changes published as part of the Core Document Library (SDLP01.1). A composite version of the policy and its supporting text showing the



proposed changes in track changes along with the reasons for the changes is set out in Appendix 2.

3.4 The next part of the SCG explains briefly the location and history of the site. The remainder of the SCG sets out five main biodiversity issues regarding the development of the site, which were raised by the SWT in their representation. This section clearly sets out matters that the two bodies agree and don't agree on.

4. Land South of London Road: Coldwaltham

The allocated site is located at the south western edge of Coldwaltham, south of London Road (A29). It is currently in agricultural use and there is no public access to the site. The field was previously arable and was put into arable reversion through re-seeding as grassland under organic Entry Level Stewardship (ELS) with Higher Level Stewardship (HLS) in 2007. This agreement expired in November 2017. To the south of the site is the Waltham Brooks Site of Special Scientific Interest (SSSI) and beyond that is the wider Arun Valley, which has Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar designations.

Reference should be made to the following documents in the Core Document Library:

- The Submission Local Plan (SDLP/01) and Schedule of Changes (SDLP01.1)
- The Preliminary Ecological Appraisal for Land South of London Road, Coldwaltham produced by Wildlife Splash on behalf of the SDNPA (SS09)
- Development brief for London Road, Coldwaltham (SS05)

5. Key Issues

a) Biodiversity value of existing field

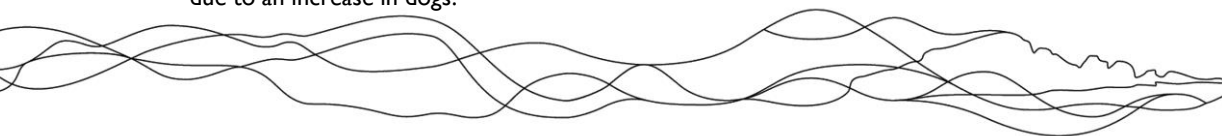
The SWT and the SDNPA agree that the National Vegetation Classification of the site is semi-improved grassland namely MG6b and that it is not a UK BAP S41 Habitat of Principal Importance lowland meadow namely MG3 and MG4 or U1 and U4.

It is also agreed further surveys would need to be carried out to support any planning application in regard to a bats, reptiles and other species likely to use the site as set out in the Preliminary Ecological Appraisal.

b) Impact on adjacent national and international nature designated sites

The SWT and the SDNPA agree that the loss of habitat caused by the proposed development would not impact on the features of interest of the Arun Valley SAC/SPA site due to the nature of the allocation site being very different namely dry meadow rather than wetland grazing marsh. The allocation site is not suitable for waders and wildfowl, nor does it support any ditches with associated rare plants and invertebrates. It should be noted that a section of the Waltham Brooks SSSI located between the railway line and the site is acid grassland rather than wetland and therefore is much more similar to the allocation site.

It is also agreed that a number of changes have been made to the policy and its supporting text by the SDNPA in order to address the issue of recreational disturbance; the policy and its proposed amendments are set out in appendix 2 of this document. The SWT is still concerned that the increase of residents in such close proximity to Waltham Brooks Nature Reserve will have an impact particularly due to an increase in dogs.



c) Net biodiversity gain

The SWT and the SDNPA agree that a net biodiversity gain can be achieved on the allocated site through a number of proposed enhancements set out in the Preliminary Ecological Appraisal.

The SDNPA consider that the proposed enhancements will greatly outweigh the negative impact of losing a quarter of semi-improved grassland and will result in significant net gains in biodiversity.

The SWT do not think that the benefits of the allocation outweigh the harm.

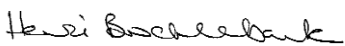
d) Function of retained open space

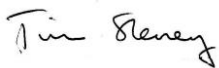
The SWT and the SDNPA agree that the primary purpose of the retained open space is to retain and enhance biodiversity rather than provide amenity grassland. The SWT and the SDNPA note and agree that the following major modification to the Submission Local Plan:

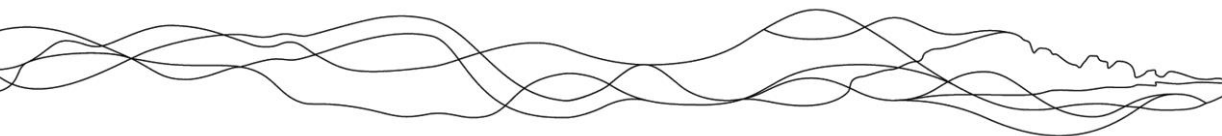
The site itself is of biodiversity value and any development proposal will need to be demonstrably guided by the existing nature conservation interest of the site, which will be informed by appropriate survey. It will be necessary to design the development to maximise existing habitats and species and retain a large proportion of undeveloped land for the purpose of retaining and enhancing biodiversity. It is of key importance therefore that the development itself and the residual open space are designed around the existing biodiversity value and not to provide amenity grassland except for that area adjacent to the south west boundary of the new homes. This must be carefully designed in order to provide a net gain in biodiversity at the local level.

e) Meadow Management Plan

The SWT and the SDNPA agree that a number of enhancements and methods of management are set out in an Outline Meadow Management Plan to be agreed between the SDNPA and the Barlavington Estate; this forms Appendix 3 of this document. Any planning application for the site will need to be accompanied by a more detailed meadow management plan to be approved by the SDNPA as the local planning authority prior to the grant of planning permission.

Signed on behalf of the Sussex Wildlife Trust

Date: 8 th November 2018
Name: Ms Henri Brocklebank
Position: Director – Conservation Policy and Evidence

Signed on behalf of the South Downs National Park Authority

Date: 08 th November 2018
Name: Tim Slaney
Position: Director of Planning



Appendix I: Representation of the Sussex and Hampshire & Isle of Wight Wildlife Trusts to the Pre-Submission South Downs Local Plan

The Trusts primary concern in commenting on this and other Local Plans is to ensure that the qualities of the natural environment are appropriately understood and valued in determining policies and allocations. The Trusts particular interest in this allocation also arises because it adjoins the Sussex Wildlife Trust's Nature Reserve at Waltham Brooks and we therefore have on the ground knowledge of the area.

It is a general weakness of Local Plan preparation that often inadequate information is gathered at a site-specific level to enable fully informed judgments to be made about the impact of the Plan on the natural environment and biodiversity. Unfortunately, this is the case here, and as stated in our general comments, this is not acceptable.

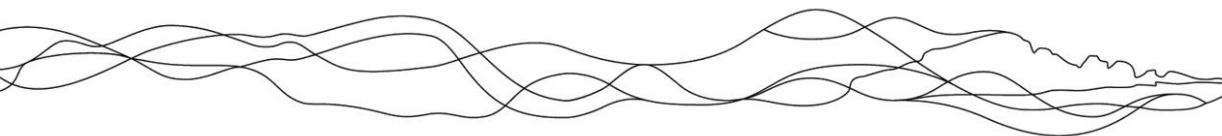
The Trusts have seen no published evidence which has assessed the biodiversity value/potential of the allocated land itself. There is some high-level consideration of the potential for adverse impact on *adjoining* and *nearby* land because they have national and international designations (Waltham Brooks SSSI; Arun Valley SPA/SAC/Ramsar), but none about the site itself or its potential wider contribution to ecosystems services.

Whilst the Sussex Wildlife Trust has not surveyed the site itself, a quick visual inspection by their Senior Ecologist has suggested that the site is at least a semi-improved hay meadow, with potential for pockets of acidic grassland. This is backed up by evidence produced on behalf of local residents (Coldwaltham Meadow Conservation Group September 2017, coldwalthammeadow.org.uk), which indicates that the allocated field is a flower-rich hay-meadow. We are also aware that the landowner has been in receipt of organic Entry Level plus Higher Level Stewardship Payments for the past 10 years to encourage biodiversity. Therefore, the site's biodiversity value and, equally importantly, its potential, can only be robustly evaluated through an ecological survey carried out by an appropriately qualified ecologist.

At the very least, a biodiverse grassland in this location buffers Waltham Brooks nature reserve, acting as part of the National Park's ecological network and connecting to other nearby designated sites such as Watts Farm Meadow and Alban Head Playing Field Local Wildlife Sites.

The fact that the site has no particular designation does not mean that it has minimal biodiversity value, nor justifies the failure to evaluate the position *prior* to considering whether an allocation is justified. The supporting text of the Plan (9.57) lists various further studies, including an ecological assessment, that are required to support a planning application. But such a requirement is no substitute for an assessment to inform the balance of considerations as to whether an allocation is justified in the first place.

Furthermore, if the landowner has been in receipt of public funds to create beneficial grassland habitat then this should be weighed in the overall balance of considerations as to whether an allocation is justified. It is recognised that once a Stewardship Agreement has come to an end there is nothing to stop a change in agricultural management of the land concerned, but there is no reason to consider that a responsible, long term landowner would necessarily want to lose the value of what has been created with public funds. To completely disregard this factor is to ignore issues of wider public policy and the public interest. It also is indicative of the fact that no consideration has been given to the biodiversity *opportunity* which the site could provide if the existing habitat were to be sustained and enhanced and how this might complement the biodiversity of adjoining land.



The absence of appropriate ecological information about the site itself is the Trusts' primary concern with this allocation. However, on the basis of existing evidence, the Trusts also question the justification for each of the 3 elements of the allocations (housing, a shop and public open space) and whether these would all be successfully delivered.

Housing proposal

The Trusts recognise the importance of providing affordable housing for those who need to live in rural communities. However, on the basis of the Authority's own assessment, the existing scale of the need to be met in Coldwaltham does not justify the size of the allocation being made. In the Authority's report *The Assessment of Site Allocations against Major Development Considerations* September 2017. Paragraph 4.11 states:

In order to demonstrate exceptional circumstances, it will be necessary to carry out a local housing needs survey in the parish to supplement the longer-term demographic need in the SHMA and to take account of the completion of the site at Silverdale. It is likely that this need will not be evident until later in the plan period and that release of this site will need to be phased for the second or third 5 years of the plan period. An additional criterion to this effect will therefore need to be included in the site allocation policy at the next stage of plan preparation. Subject to this and to the mitigation measures referred to above, it is considered that the tests for exceptional circumstances in the public interest would be met.

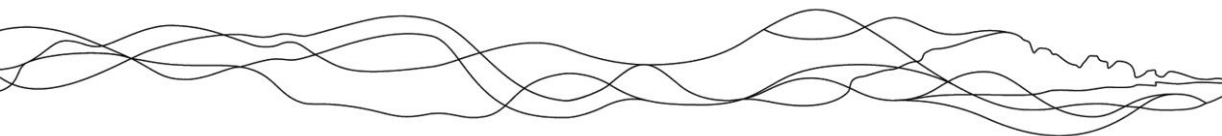
The same paragraph was included in the Authority's similar report in 2015. Nothing has been done to address the issues raised. No recent needs assessment specifically for Coldwaltham has been published to support the allocation. The 8 affordable dwellings at Silverdale have only recently been started, so it will be some time before they are occupied and a realistic picture can be gained of any remaining local needs.

A potential need in the long term which has not yet been fully assessed is an inadequate basis to allocate a "major" site in a small village with poor facilities and accessibility. It is simply premature to allocate a site of this scale now. Given the statutory primacy of the development plan in decision making, if the allocation were to be retained in the plan on adoption, it would be very difficult for the SDNPA to resist housing development even if a future needs survey concluded that there was not a need for 15 affordable dwellings (50% of 30).

Notwithstanding our, in principle, concern set out above, it is also noted that no additional criterion has been added to the policy to refer to its phasing to later 5 year periods as indicated as being necessary in the reports of 2015 and 2017. The Authority is not having regard to its own assessments.

It is also noted that Coldwaltham scores poorly (only 3) in the Authority's *Settlement Facilities Assessment*, September 2015. This is much lower than the scores for other settlements with allocations of the scale proposed. In this regard Coldwaltham does not appear to be a location suitable to meet wider housing needs and provision should be limited to meet specific local needs only.

The aim of allocations such as this is to maximise the provision of affordable housing. Policy SD28 seeks 50% provision on sites of more than 10 dwellings. However, the Authority's own Viability Assessment (VA, BNP Paribas August 2017) indicates that this target may be difficult to achieve here. Coldwaltham is in the lowest value category - Category 5 (VA Table 5.7.1). The results in VA Table 7.10.1 indicate that for affordable housing provision in accordance with policy SD28, no



schemes in these settlements have a residual value which exceeds the benchmark land value and are therefore considered not viable.

However, this allocation is not straightforward and includes a substantial “package” of other proposals. It is assumed that the developer is required to fund/provide all the other elements included in the policy (but see also below). Given the questionable viability even for a conventional development, there must be a high risk that at the application stage the additional costs of these works could be used as a reasons/excuse to further reduce affordable housing provision. The creation of an attractive useable area of public open space is not cheap and it is assumed that a substantial payment would also be required for its long-term maintenance. The SDNPA needs to be sure at this stage that the chief reason for such an allocation - providing affordable housing - is not subsequently undermined. This points to any housing site in Coldwaltham needing to be a smaller, simpler proposal, and a better contained site without additional cost requirements.

The Proposed Shop

Policy SD64 proposes land be set aside for a small shop. The Trusts recognise the benefit to local people and sustainability if a general-purpose store were to be provided and sustained over the long term. However, there must be considerable doubt as to whether this would actually occur. The Trusts have seen no published evidence by the Authority as to the likely market interest/viability of a shop in this location, bearing in mind that a new building would need to be provided.

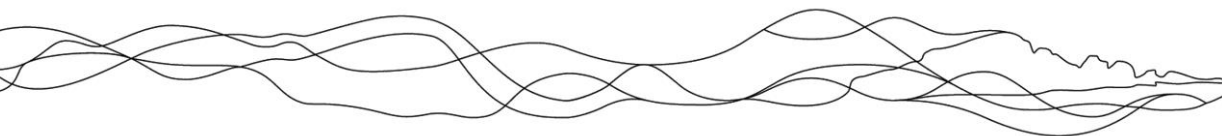
Proposed Open Space

A major part of the site allocated by the policy is proposed as publicly accessible open space. Policy SD64 2 c) indicates that the primary purpose of the open space provision is to provide an alternative to designated sites in the Arun Valley. The Trusts welcome, in principle, suitable recreational provision which would help ease recreational pressures on more sensitive habitats, but has seen no analysis to assess whether the size/location/design of the proposed open space would actually fulfil that purpose. The Trusts fear that the opposite may be the case - increased recreational pressures from the additional housing and because the provision of parking and additional open space makes the general location more attractive to walkers. Paragraph 9.54 of the Plan refers to links to the wider countryside which would only serve to facilitate increased access to the Trust’s reserve.

The Sussex Wildlife Trust already experience recreational disturbance on the site, particularly from dog walkers. It should be noted that the owner of the allocated site has recently put a gate into the southern edge of the field due to the fence being repeatedly cut, presumably by dog walkers to allow more direct access into Waltham Brooks from the existing housing on Brooklands Way.

The provision of Suitable Alternative Natural Green Space (SANGs) is now a well-established mitigation strategy where development may adversely impact protected habitats, such as in relation to the Thames Basin Heaths. However, the policy approach there requires SANGs to be of substantial scale and carefully designed to ensure that they provide an attractive alternative to the sensitive natural habitat to be protected. The modest size of the open space proposed in policy SD64 raises doubt as to its likely effectiveness. The Trust would welcome a comprehensive approach to this issue, but in the absence of any evidence/analysis to support this site for this purpose, it considers that the benefit of this element of the proposal is uncertain.

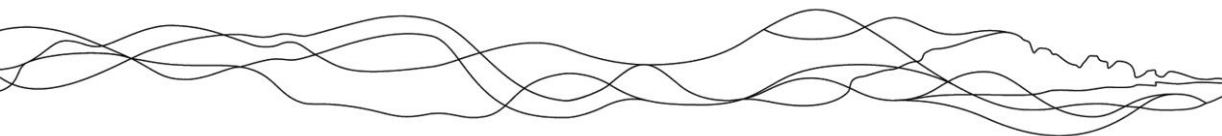
There must be some doubt as to whether the open space would actually be delivered as part of the housing development. If that is what the SDNPA intend it is not made clear in the policy.



Furthermore, even if there was such a direct policy requirement could it actually be justified, particularly in relation to the legal and policy tests necessary to require a section 106 legal agreement linking the two. Even if the landowner appears content at this stage, if the housing part of the site were to be sold to a developer they may well want to contest the issue at application stage. To be effective, the SDNPA needs to have evidence now to demonstrate that the new housing would have an unacceptable impact without the open space proposed. That may not be an easy task. (The provision of the open space is different to the justification for major landscaping to soften the development - that is clearly required given the SA assessment that the landscape impact would be high and unacceptable without mitigation).

Conclusion

Given the local evidence of the site's likely biodiversity value and potential, the Trusts consider that the absence of an ecological assessment of the site is sufficient, in the context of a National Park Plan, to make the allocation unsound. This unsoundness is reinforced by the uncertainty over the scale of long term social need for housing in Coldwaltham, its poor facilities and accessibility, and a lack of evidence to demonstrate that the other elements of the proposed allocation would actually be delivered and achieve their purpose. It is therefore considered that the allocation is unsound and should be removed from the plan. The need for housing at Coldwaltham and possible alternative sites can be considered afresh at the next review of the Plan.



Appendix 2: Policy SD64: Land South of London Road, Coldwaltham incorporating the proposed main modifications and minor edits with explanatory text.

COLDWALTHAM

9.46 Coldwaltham is a historic village in West Sussex located 2.5 miles south of Pulborough in the Arun Valley. The London Road (A29) runs through the village. To the east of the village is the Waltham Brooks Nature Reserve.

LAND SOUTH OF LONDON ROAD, COLDWALTHAM

Site area: 8.1ha

Developable Area (within updated settlement

boundary): 2.00ha

Open Space Area (outside updated settlement

boundary): Approx. 6.00ha

Current Use: Agricultural

Environmental Designation: Waltham Brooks SSSI, Arun Valley SAC, SPA & Ramsar to the east and south of the site

Site within the Houghton to Coldwaltham Biodiversity Opportunity Area (BOA)

Dark Night Skies (EI)

Minerals: Mineral Consultation (sand)

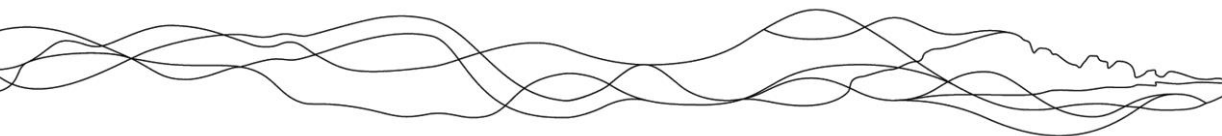
Commented [LH1]: Added for consistency with other policies and in response to rep

9.47 The site is located south of London Road (A29) at the south-western end of Coldwaltham adjacent to the existing housing at Brookview and Brookland Way. The site is currently in agricultural use and devoid of any permanent buildings. To the south of the site is a sewage works, part of the Waltham Brooks Site of Special Scientific Interest (SSSI) and a railway line. Beyond that is the wider River Arun valley which has Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar designations.

9.48 ~~The proposed allocation site is considered to comprise major development and as such proposals should address Core Policy SD3.~~ Development proposals should provide suitable mitigation of the impact of the development on the closely sited designated sites. Possible solutions involve working with the site management to implement schemes including:

Commented [LH2]: Update in line with other policies

- Provide signage requiring dogs on leads and giving information on the nature designations;
- Funding for leaflets regarding recreational disturbance, to be delivered to new householders;
- Funding for Take the Lead Campaign, dog ambassadors and the provision of dog bins;



- Ten year monitoring programme of dog numbers visiting the SSSI and of any changes to subsequent management burden arising from an increase in dog numbers.

Commented [LH3]: Possible mitigation solutions provided in response to the HRA

9.48a-These The designated sites are sensitive to change in local hydrology and as such development proposals should incorporate suitable surface water and foul water drainage. The site should provide between 25 and 30 dwellings and associated open space. The open space will be secured in perpetuity through a planning obligation. It should be noted that the proposed area of open space is located outside the settlement boundary for Coldwaltham as defined on the Policies Map.

9.48b The site itself is of biodiversity value and any development proposal will need to be demonstrably guided by the existing nature conservation interest of the site, which will be informed by appropriate survey. It will be necessary to design the development to maximise existing habitats and species and retain a large proportion of undeveloped land for the purpose of retaining and enhancing biodiversity. It is of key importance therefore that the development itself and the residual open space are designed around the existing biodiversity value and not to provide amenity grassland except for that area adjacent to the south west boundary of the new homes. This must be carefully designed in order to provide a net gain in biodiversity at the local level.

Commented [LH4]: Text provided by Natural England

Commented [LH5]: New wording agreed with SWT and landowner to provide clarity.

9.49 The allocation site is also located in a wider area identified as a groundwater source protection zone. Development proposals will need to demonstrate no significant impact on groundwater resources.

Commented [LH6]: Update

9.50 The National Park Authority ~~will be producing~~ has produced a Development Brief for the allocation site¹ and will expect proposals to accord with the Brief. The site has medium / high to high landscape sensitivity and as such will need to come forward within a robust and appropriate landscape and townscape led development strategy. The northern, western and southern boundaries of the site each have specific landscape sensitivities, which development must respond to and reinforce where appropriate. ~~A Concept Plan (overleaf), which will form the design principles to be provided in the Development Brief, sets out the extent of the proposed built development and key topographical features.~~

Commented [LH7]: Update as the Concept Plan was superseded by the Development Brief

9.51 The site has a settlement separation function between Coldwaltham and the nearest settlement to the west, Watersfield. Development must retain and improve that sense of separation between the two settlements.

9.52 Residential development should reinforce local distinctiveness and respond to the local character and vernacular in West Sussex through the predominant use of traditional materials. To optimise the potential of the residential area it should incorporate high quality, appropriately scaled, and inclusive public open space.

9.53 ~~The westernmost and southern portions of the site should provide accessible and be retained as~~ landscaped open space to be secured permanently through a suitable planning obligation. The form of that open space should be informed by local community engagement and biodiversity evidence. The open space should provide a suitable transition from the existing and proposed residential areas to the Waltham Brooks SSSI. ~~A small area of vehicular parking to serve users of the open space would be acceptable adjacent to the existing allotments on Brookland Way.~~

Commented [LH8]: Changes made in response to Natural England and the Wildlife Trust. The intention is to maximise the maintenance and enhancement of biodiversity whilst being mindful that the recreational use of the undeveloped part of the site may have a deleterious impact on the biodiversity value of the site.

9.54 Vehicular access to the site should be from a new access from the A29. Development should provide suitable pedestrian and cycle routes to connect to existing residential areas and the adjacent open countryside. The proposal should incorporate a new pedestrian route from the A29 into the public open space which links into the wider countryside.

¹ Land South of London Road, Coldwaltham Development Brief (South Downs National Park Authority, 2018)

9.55 Development provides an opportunity to improve the quality of the public realm of the residential area to the east. Existing boundary treatments not formed by mature trees and hedgerows should be removed and replaced, where appropriate, with suitable alternatives. Improvements to the existing children's play area in the adjacent housing area would be preferred to new provision within the proposed residential area.

Commented [LH9]: Provide clarity

9.56 The development, both the residential areas and open space, should provide suitable biodiversity improvements in line with local strategies.

9.57 Development proposals should therefore be informed by the following evidence studies:

- Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan;
- Ecology Assessment including Protected Species Survey;
- Flood Risk Assessment including Surface Water Management Plan;
- Hydrological Survey;
- Landscape Visual Impact Assessment; and
- Project Level Habitats Regulations Assessment.

Allocation Policy SD64: Land South of London Road, Coldwaltham

1. Land South of London Road, Coldwaltham, is allocated for the development of 25 to 30 residential dwellings (class C3 use). Development for a Class A1 (Shop) unit with a net sales floorspace up to a maximum of 280m² with suitable vehicular parking for customers will also be permitted. The remainder of the allocation site should be publicly accessible retained as open space and a small area of vehicular parking for users of the open space. Planning permission will not be granted for any other uses.

Commented [LH10]: Changes made in response to Natural England and the Wildlife Trust. The intention is to maximise the maintenance and enhancement of biodiversity whilst being mindful that the recreational use of the undeveloped part of the site may have a deleterious impact on the biodiversity value of the site.

2. ~~The National Park Authority will prepare a Development Brief to assist the delivery of the site.~~ Detailed proposals that are in broad conformity with the Development Brief and that meet the following site specific development requirements will be permitted:

Commented [LH11]: Update

- a) To demonstrate that there would be no likely significant effect on the Waltham Brooks Site of Special Scientific Interest (SSSI), the Amberley Wild Brooks SSSI, The Mens Special Area of Conservation (SAC) and the Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site and that suitable mitigation, where deemed necessary, will be secured through planning obligations and / or planning conditions;
- b) Development must be informed by a comprehensive landscape and design strategy and through reinforcing local distinctiveness provide a suitable transition in form and fabric from the existing residential areas to the east and the open countryside to the north, west and south;

Development must be demonstrably biodiversity-led and guided by the existing biodiversity value of the site. It will be necessary to design the development to maximise existing habitats and species and retain a large proportion of undeveloped land for the purpose of retaining and enhancing biodiversity.

Commented [LH12]: In response to Natural England the Wildlife Trust to achieve net biodiversity gain.

- c) To provide the residual area of the allocation as accessible, landscaped open space with the primary purpose of providing retaining and enhancing the existing biodiversity value of the site and to provide an alternative to designated sites in

the Arun Valley;

- d) To provide a new vehicular and pedestrian access from the A29 London Road and suitable pedestrian & cycle links to the rest of the settlement and adjacent open countryside;
- e) To provide all necessary vehicular parking on-site to avoid additional on street parking in adjacent residential areas and a small area of on-site parking for users of the public open space;
- f) To provide appropriate biodiversity improvements reflecting relevant national and local strategies including a meadow management plan;;
- g) Existing mature trees and hedgerows to be retained and enhanced;
- h) To provide suitable flood risk mitigation;
- i) Demonstrate no significant harm to be caused to groundwater resources;
- j) Improvements to the public realm of the adjacent housing area including removing existing boundary treatments and replaced with suitable alternatives where appropriate; and
- k) Demonstrate that the proposal would not have a significant harmful impact on the supply of local minerals.

Foul drainage to connect to the mains system at the nearest point of capacity.

Provide suitable on-site surface water drainage that protects the adjacent nature conservation designations from adverse hydrological impacts and is designed to incorporate existing biodiversity.

Provide adequate separation between Coldwaltham Wastewater Treatment Works and the development to allow odour dispersion on the basis of an odour assessment to be undertaken in consultation with Southern Water.

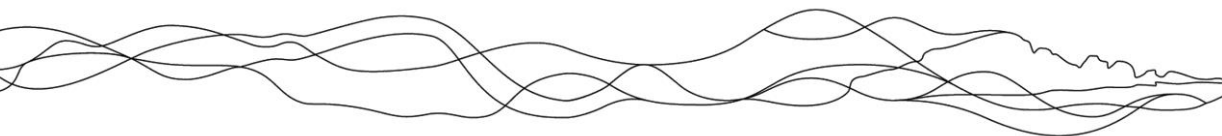
Provide future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

3. The National Park Authority has prepared a Development Brief to assist the delivery of the site. Development proposals in broad conformity with the Development Brief will be permitted.

Commented [LH13]: Changes made in response to Natural England and the Wildlife Trust. The intention is to maximise the maintenance and enhancement of biodiversity whilst being mindful that the recreational use of the undeveloped part of the site may have a deleterious impact on the biodiversity value of the site.

Commented [LH14]: Added in response to Natural England and Southern Water to address concerns of hydrological impacts

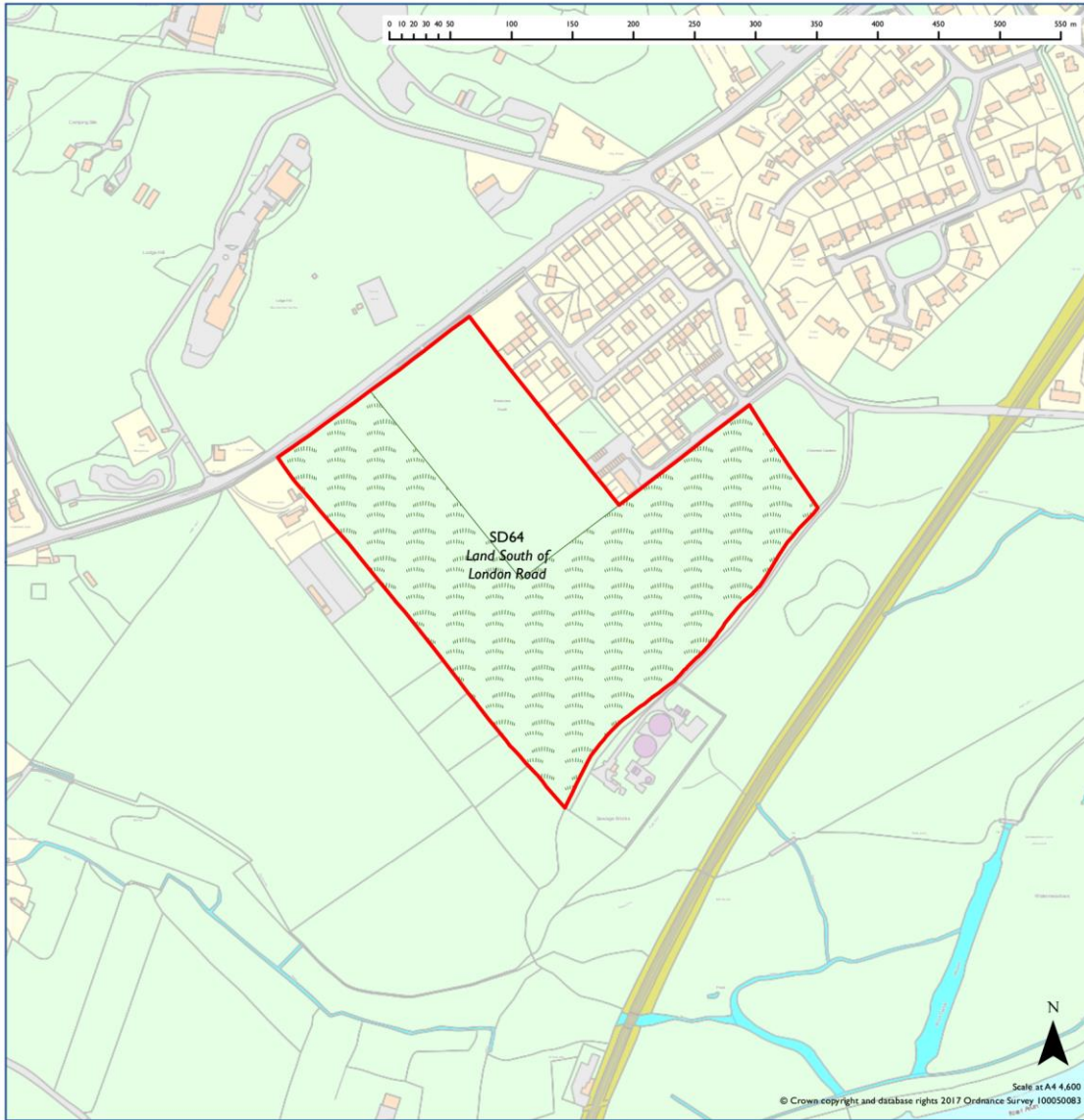
Commented [LH15]: Update



Site Ref: SD64
Land South of London Road
Coldwaltham

 SDNPA Pre-submission Housing Allocation

 Mixed Use Allocation (SD64) – open space



Appendix 3: Outline Meadow Management Plan for Land South of London Road, Coldwaltham allocated under emerging Policy SD64 of the Submission South Downs Local Plan.

Introduction

This Outline Meadow Management Plan (OMMP) is a jointly agreed document between the Barlavington Estate and the South Downs National Park Authority (SDNPA). It sets out a summary of high level enhancements and management approaches related to the development of draft Allocation SD64: Land South of London Road, Coldwaltham in the Submission South Downs Local Plan. Any planning application for the site will need to be accompanied by a more detailed meadow management plan informed by up-to-date ecological information and to be approved by the SDNPA as the local planning authority prior to the grant of planning permission. The detailed plan will provide the technical specifics necessary to achieve the net gain in biodiversity for the site including timing and phasing of actions; it will also include a long term monitoring section. The enhancements set out in this document are the responsibility of the Barlavington Estate as landowner to implement. This responsibility passes in perpetuity to any future landowner of the site.

Appendix I is a map of the draft allocation site showing the proposed area of housing and the residual area of open space. The map references the areas of habitat enhancement and methods of management set out in the OMMP.

The Barlavington Estate and the SDNPA note and agree that the following major modification to the Submission Local Plan:

The site itself is of biodiversity value and any development proposal will need to be demonstrably guided by the existing nature conservation interest of the site, which will be informed by appropriate survey. It will be necessary to design the development to maximise existing habitats and species and retain a large proportion of undeveloped land for the purpose of retaining and enhancing biodiversity. It is of key importance therefore that the development itself and the residual open space are designed around the existing biodiversity value and not to provide amenity grassland except for that area adjacent to the south west boundary of the new homes. This must be carefully designed in order to provide a net gain in biodiversity at the local level.

Reference should be made to the following documents in the Core Document Library:

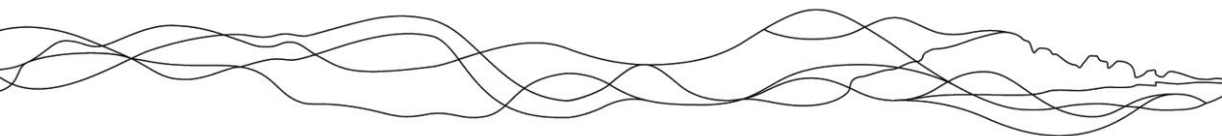
- The Submission Local Plan (SDLP/01) and Schedule of Changes (SDLP01.1)
- The Preliminary Ecological Appraisal for Land South of London Road, Coldwaltham produced by Wildlife Splash on behalf of the SDNPA (SS09)
- Development brief for London Road, Coldwaltham (SS05)

Enhancements and Methods of Management

The Barlavington Estate agree to implement the following enhancements to the open space allocated under emerging Policy SD64: Land South of London Road, Coldwaltham

Meadow Management and Enhancement

The residual meadow area as shown on the Map in Appendix I will be kept under traditional meadow management, which is a cut in the late summer after flowering and seed set followed by grazing of the aftermath. This will slowly strip the meadow of nutrients and will churn the soil, trample in the seeds and provide small bare patches and niches providing safe



sites for germination. It is also beneficial to a range of invertebrates. The shorter mown grassland will increase the value of the meadow for invertebrates giving basking and hunting opportunities, particularly if the pathway eventually becomes a well-trodden track. The cuttings will be removed to prevent nutrient build up.

Hedgerow creation

The restoration of the gappy hedgerow along the south west boundary of the field will provide a continuous corridor from woodland to the north of the field to woodland to the south west of the field. This would be of immense value to dispersing Dormice if they are in the area. It would also provide a safe corridor (flight line) for commuting bats to the north of the site accessing the rich foraging grounds of Waltham Brooks.

Scrub creation along the hedgerows particularly in the south and west corners of the field will support breeding nightingales at Waltham Brooks.

Restoration and strengthening of the hedge that runs south east along the site boundary will serve to deter access on to Waltham Brooks.

A hedgerow to replace the metal fencing around the existing housing, including the south east facing edge of the housing, will vastly increase the potential for nesting birds, invertebrates and reptiles. Moreover a hedgerow around the new housing will further achieve this and, in total, this will amount to approximately 750 m of new hedgerow creation.

The hedgerows will comprise native species sourced from stock of local provenance where possible, with a mixture of properties such as berries, nuts, nectar, thorns and dense foliage selected from the following list of suitable species:

- Blackthorn (*Prunus spinosa*)
- Common Dog Rose (*Rosa canina*)
- Crab Apple (*Malus sylvestris*)
- Dogwood (*Cornus sanguinea*)
- Field Maple (*Acer campestre*)
- Guelder-rose (*Viburnum opulus*)
- Honeysuckle (*Lonicera periclymenum*)
- Hawthorn (*Crataegus monogyna*)
- Holly (*Ilex aquifolium*)
- Pedunculate Oak (*Quercus robur*)
- Yew (*Taxus baccata*)

Hedgerow management

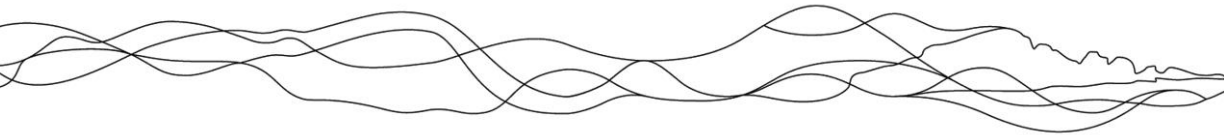
Subsequent hedgerow management will seek to maximise the biodiversity potential for all groups.

When cutting the field a margin of vegetation of one to two metres wide should be left allowing a margin Bramble grading into tall herbaceous vegetation to develop. Hedgerows will be trimmed in January or February to avoid the destruction of birds' nests (present from March to August) and to allow any berry crop to be used by wintering birds (September to December).

Hedgerows will be trimmed on a two or three year rotation, rather than annually, to ensure that thick nesting cover is available, and to boost the berry crop that generally develops on second-year growth.

Nectar and niche provision

The addition of species with a longer corolla such as Betony *Betonica officinalis*, Common Comfrey *Symphytum officinale*, Hedge Woundwort *Stachys sylvatica* and Honeysuckle *Lonicera*



periclymenum (a plant specifically for hawk-moths) will provide a welcome nectar source for long-tongued bumblebees and hawk-moths.

Additionally, an increase in the range of flowering plant species will result in far more niches for invertebrates and encourage specialist invertebrates that may be reliant on a particular, less common plant species.

Proposed pathways, hedgerows and short-term grazing will also vastly increase the number of niches available for invertebrates.

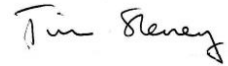
Artificial nest sites

Nest boxes will be incorporated into the new development with boxes incorporated into the buildings facing the meadow. They can be placed under eaves and on walls. It is also recommended that bat bricks and boxes be incorporated into the fabric of the buildings.

A Barn Owl box will be fitted to one of the Oaks along the south east boundary of the meadow to take advantage of the high quality foraging opportunities in the vicinity for such birds of prey.

The Sussex Wildlife Trust will support the Barlavington Estate with conservation management advice when required, to ensure that the meadow remains in positive conservation management and enhances the biodiversity value of the adjacent designated site.

Signed on behalf of the South Downs National Park Authority

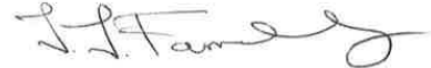

--

Date: 08 th November 2018

Name: Tim Slaney

Position: Director of Planning

Signed on behalf of the Barlavington Estate



Date: 08 th November 2018

Name: Jeremy Farrelly

Position: Planning Associate, Genesis Town Planning Ltd

