

Coldwaltham Meadow Conservation Group

Matter 7: Landscape, Design and Special Qualities

A position statement derived from our original representations concerning:

- The Habitat Regulations Assessment (Comment ID No. 2439)
- The Sustainability Appraisal (Comment ID No. 2438)
- Core Policy SD2: Ecosystem Services (Comment ID No. 2441)
- Core Policy SD3: Major Development (Comment ID No. 2442)
- Strategic Policy SD4: Landscape Character (Comment ID No. 2443)
- Strategic Policy SD6: Safeguarding Views (Comment ID No. 2444)
- Strategic Policy SD8: Dark Night Skies (Comment ID No. 2445)
- Strategic Policy SD25: Development Strategy (Comment ID No. 2452)

The level of protection in terms of ‘conserve and enhance’ afforded by the SDNPA Local Plan

1. The Local Plan does not fulfil the Primary Purpose of the National Park; it does not adequately conserve and enhance the landscape, nor does it provide adequate protection for the other Special Qualities of the National Park.

2. *“Landscape is key to all of the special qualities. The South Downs was designated as a National Park in recognition of its exceptional natural beauty, for the opportunities to learn about and appreciate its special qualities, and as a landscape of national importance. Therefore it is entirely appropriate to take a landscape-led approach to the formulation of its Local Plan.”* (Local Plan, 1.13)

“Potential effects on landscape in the National Park from the Local Plan are of paramount importance given the designation, its Purposes and Duty and its special qualities. This is reflected throughout the policies in the Local Plan, which have a close focus on protecting and enhancing landscape character in the National Park.” (SDNPA SA 4.3.2 p.69)

“...the plan has to be found “sound” if it is to conserve the wider landscape to which the highest degree of protection has been offered by [the] planning system. We have searched thoroughly and rigorously for suitable development sites; it is just that in carrying out this work landscape conservation takes the primary role.” (SDNP LP Key Messages)

Notwithstanding these assertions, *Table 4.1: Summary of the appraisal of site allocations through the Submission Local Plan, SDNPA SA, p. 65*, shows that of the 37 Allocation Sites that were appraised, only five sites were considered to have ‘neutral or no effects’ on Landscape and only three were considered to have ‘likely positive effects.’ The five sites, (13.5% of the total) with neutral or no effects, could perhaps be charitably construed as ‘conserving’ the landscape of the National Park and the three sites with likely positive effects (8% of the total) could be considered to be ‘enhancing’ the landscape. Thus only 21% of the Allocation Sites might be considered to ‘conserve and enhance’ the landscape of the National Park.

3. Of the proposed 37 allocation sites shown in Table 4.1, 27 (73% of the total) have been appraised as having ‘*uncertain effects*’ on the landscape. Two sites (Policies SD64 and SD79) are considered to have ‘*likely adverse effects*’, on the landscape, with the qualifier “*significant*” used in describing these effects. In a Local Plan that stresses the primacy of landscape quality, these two sites should be withdrawn in order for the Plan to remain sound.

4. Given that “*The landscape is also the foundation for the other special qualities of the National Park*” (SDNP LP, 5.4), it follows that the 27 allocation policies appraised as having ‘*uncertain effects*’ on the landscape will therefore also provide ‘*uncertain*’ support for the Park’s Special Qualities. It also follows that the two allocation policies, SD64 and SD79, with their potential for significant likely adverse effect on the landscape, will also be highly unlikely to support the Special Qualities of the National Park. This is additional grounds for the removal of SD64 and SD79 from the Local Plan.

The level of protection afforded by the SDNPA SHLAA, Dec 2016

5. The identification of potential housing sites within the SHLAA is fundamentally based on landscape assessment:

“Given the importance of landscape in the South Downs National Park, there are specific detailed criteria which have enabled a landscape-led approach to assessing the sites (the Landscape Assessment Criteria)”. (SHLAA, 1.3, Dec 2016)

“...Therefore, a fundamental part of the assessment of potential housing sites is the consideration of any potential detrimental impact on landscape.” (SHLAA, 3.12, Dec 2016)

6. The sites for Allocation Policy SD64 and Strategic Policy SD79 have both been assessed in the SHLAA (Dec 2016) as being of ‘High Landscape Sensitivity’, which accords with the Sustainability Appraisal scoring of ‘likely adverse effect’ on the landscape for these two Policies. According to *Table 2.8: Landscape sensitivity assessment criteria for SHLAA sites* (SDNPA SA), key characteristics of landscapes that are considered to be of High Sensitivity “*...are highly vulnerable to development. Development would result in significant change in landscape character and should be avoided.*”

7. The SHLAA criteria 3.21 indicates “*...development in areas defined as having an open countryside character, or at settlements with few or no local services, are unlikely to fare well against the assessment criteria. Whilst this does not rule out consideration of sites in such settlements...the presumption has been that these are less likely to be suitable for development.*” (The village of Coldwaltham, the settlement closest to Policy SD64, has a SDNPA Site Facilities Assessment of just 2.5).

8. Strategic Policy SD79 appears to be sited on an open area within a meander of the River Ouse, and we can personally confirm that Policy SD64 represents “*an incursion into the open countryside.*” (Assessment of Site Allocations Against Major Development Considerations, (SDNP Technical Report, Envision 2015, updated September 2017). Both Policies are situated on a greenfield site outside the current settlement boundary and one of the sites is described in the Local Plan as having a “*settlement separation function*” (9.51, Policy SD64,

SDNLP) and is very close to the Dark Sky Core. As we have outlined in our representations 2443 and 2444, Policy SD64 is highly visible in the landscape. It will remain so, for as we have illustrated with photographic evidence in our representation to Policy SD6 (Comment ID No. 2444, and enclosed with this position statement), the sloping nature of the site ensures that landscaping, even if proposed, will not screen views of the development from the other side of the Arun Valley or the South Downs Way.

9. Despite the SHLAA criteria 3.21 referred to above, and the SA scores of 'High Landscape Sensitivity' for Policies SD64 and SD79, these Policies remain in the Local Plan, indicating that the Plan is not landscape led. Indeed, as we have detailed in our original representation to the SDNPA SA (Comment ID No. 2438), attempts were made by SDNPA to manipulate a landscape appraisal in order to justify one of these Policies, and the manipulated text features in the Local Plan*.

10. This manipulation is consistent with the SDNPA's distortion of texts and statistics in the HRA (referred to in our representation to the HRA, Comment ID 2439, and in our Position Statement for Matter 2) and we consider this as evidence that at least one of the two significant 'likely adverse effect' allocations in the Local Plan are housing target-driven, rather than landscape capacity-led.

11. This housing target-driven approach is further corroborated by the absence of Ecosystem Services icons for Policy SD64, which conveys, as we have outlined in our original representation to Core Policy SD2, Comment ID 2441, the erroneous impression that development would not result in the loss of natural capital. Interestingly, the Development Brief for Policy SD64 displays multiple ES icons. The inescapable conclusion from this remains that the Landscape is not of paramount importance in the Local Plan, and that the level of protection for it is poor.

*[SDNPA did this by inserting SHLAA text relating to an area of 'Medium/High Sensitivity' associated with a former allocation policy, HO015, (which was in a different, less visible, part of the site in which SD64 is situated) into the Sustainability Appraisal of Policy SD64. This insertion is still evident in the description (9.50) of Policy SD64 in the Local Plan.]

The balance of the Landscape-led and Ecosystem approaches with the wider purpose of planning

12. *"Any development in the National Park has the potential to cause harm to the landscape both individually and cumulatively. These policies seek to ensure that development avoids having a detrimental impact on the landscape and its special qualities, and, wherever possible, enhances the landscape." P.51*

"All the Local Plan policies have been formulated putting landscape first... Many Local Plan Policies require development proposals to conserve and enhance various aspects of natural beauty, wildlife and cultural heritage. The extent to which development proposals will be expected to both conserve and enhance is proportionate to the scale and impact of the development." (LP, 1.19).

These two quotes appear to be at odds with each other, for if the Local Plan truly puts landscape first, the extent to which development proposals will be expected to conserve and enhance the landscape should be to the greatest possible extent, consistent with the Purposes of the National Park. Although it is accepted that all landscapes are of value in the National Park, some are clearly of more value than others; enhancing townscapes is both laudable and appropriate in a National Park, but not at the expense of its nationally important, iconic open countryside landscapes.

13. However, the concept of 'balance' implies that the National Park's Purposes could be compromised by the National Park's Duty, and that this is acceptable. This is illustrated by the comment from the National Park that *"The Authority is aware of the likely effect on the landscape, but think that on balance the benefits of the scheme outweigh this effect"* (SDNPA Summary of Issues and Responses, p.261). This response is highly questionable, for the Duty to *"seek to foster the economic and social well-being of the local communities within the National Park"* is supposed to be *"in pursuit of our [National Park's] purposes"* (SDNP Management Plan, 1.3).

14. The concept of balance raises other questions; what are the 'benefits', and who are they for? Are they assured? how do the benefits outweigh the impact on *"the national importance of the landscapes and our duty to conserve and enhance them"*? (Margaret Paren, Foreword, Local Plan.) In the case of Strategic Policy SD79, it would appear that the large quantum of houses proposed, and the lack of available developable land elsewhere in Lewes, are considered by the National Park to outweigh the significant likely adverse effect on the landscape.

15. These conditions do not apply to Policy SD64, for as we have outlined in our representation to Core Policy SD3 (Comment ID No. 2442), the development delivers at best a *"marginal"* benefit to the local community in terms of the local economy. (Source: *Assessment of Site Allocations Against Major Development Considerations, SDNP Technical Report, Envision 2015, updated September 2017*). There is no evidence of local housing need that hasn't already been met by recently completed development in the village (*ibid*) and we have been informed by a SDNP Planning Officer that there is a *"significant over-supply of housing"* in the early years of the Local Plan (*pers comm at Local Plan Enquiry into Matter 4, Housing Need and Supply*). There is therefore no justification in terms of housing need for Policy SD64's significant negative impact on the landscape.

16. Notions of balancing the wider purpose of planning with a landscape-led approach does not take the social cost of development into account. As we have outlined in our representations to the SDNPA Sustainability Appraisal, and to Strategic Policy SD4, a new housing estate located on the edge of a rural settlement will result in a perceived diminution in tranquillity, associated with an increase in urbanisation. Local residents will be deprived of a cherished visual amenity that is currently making a positive, distinctive contribution to landscape character. This will inevitably cause resentment, and the location of the new estate will cause problems with social integration and cohesion.

17. In any event, as we have indicated in our representation to Core Policy SD3, there are three other sites available in the village that do not impact on the landscape. A fourth site,

also without detriment to the landscape, has also come forward. The fact that four sites available for development came forward as a result of our enquiries indicates that the “Call for Sites” was not thorough or rigorous enough; it also indicates that the so-called benefits attributed to Policy SD64 could still be achieved by development at these other sites, without any of the landscape ‘costs.’

29.11.18

(The photographs overleaf illustrate the impact that Policy SD64 would have on the landscape when viewed from The Sportsman Inn at Amberley, and from the South Downs Way).

VIEW FROM SPORTSMAN INN AMBERLEY

WATERSFIELD

HOUSING

COLDWALTHAM



VIEW FROM SOUTH DOWNS WAY

WATERS FIELD

HOUSING | COLDWALTHAM

