

Coldwaltham Meadow Conservation Group

Matter 11: Individual Sites (Policy SD64)

A position statement based on our representation to Allocation Policy SD64 Land South of London Road (Comment ID No.2453) and all our other representations, viz 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2456, 2447, 2448, 2449, 2450, 2451, 2452.

Policy SD64 is not an appropriate location for housing in the National Park. It is not coherent with the First Purpose of the National Park and should be deleted from the Local Plan because it cannot be modified to make it sound.

Landscape/landscape Character

1. Policy SD64 will be highly visible in the landscape. Contrary to the Local Plan description, SD64 is located in an area defined by the SHLAA as *“High Sensitivity, due to the elevation and openness at the northern end of the site and along the public right of way”*. It has a SA landscape impact rating of *“likely adverse effect”*, with the commentary *“...due to the sensitivity of the site, potential effects on landscape quality may still arise.”* SD64 is one of only two sites in the Local Plan with this assessment; it should be withdrawn from what is supposed to be a landscape-led Local Plan.

1.1 As detailed in our representations to SD4 and SD6, it is impossible to screen SD64 from long views, due to the topography of the site and the fact that it is *“an incursion into the open countryside”* (Assessment of Site Allocations against Major Development Considerations, Envision, 2015 & 2017.) As such, SD64 is considered a major development in the National Park (*Ibid*). The NPA comment *“The development would read as an extension to the existing settlement and if well designed should not need to be screened from key vantage points”* (SDNPA Coldwaltham Development Brief Response 18, Nov 18), is tacit agreement with this. However, the assertion that good design would mitigate the impact on the landscape, contradicts both the impact rating and the commentary given for SD64 in the SDNPA SA. This is tantamount to saying that townscapes can be extended, to the detriment of a nationally protected, iconic landscape, if they are made to look attractive. From long views, whatever the quality of the settlement extension, SD64 will be seen for what it is; the creeping encroachment of suburbia into the rural landscape of this part of the National Park. This is not coherent with the first part of NPPF 109, all of 115 and all of 116; neither is it coherent with 1b) of Strategic Policy SD4 and point 1 of Strategic Policy SD6.

1.2 Policy SD64 lacks coherence with 1c) of strategic Policy SD4, with 2c) and 2d) of Strategic Policy SD6 and Local Plan Objectives 1, 2 and 5. This is because it has *“the potential to have a serious adverse impact on the natural beauty and recreational opportunities of the National Park”* (3.51, Assessment of Site Allocations against Major Development Considerations, Envision, 2015 & 2017). It will block breathtaking views across the protected landscape of the National Park (including from Rackham Banks Scheduled Ancient Monument) and will negatively impact upon the many thousands of walkers, horse riders and cyclists that use the Open Access Land, particularly the South Downs Way. The

experiential and amenity qualities of the landscape will not be safeguarded and SD64 will adversely affect their perception of scenic quality and rural tranquillity.

1.3 Policy SD64 is not coherent with point 3 of Strategic Policy SD6, because it will also block both near and distant views of the National Park for local residents and users of the A29. It will be visible to thousands of travellers on a busy major trunk road on a daily basis. Their sequential views of the South Downs will be replaced by those of a ribbon development, connecting Watersfield with Coldwaltham, punctuated by a field gap of only 150 metres.

1.4 Policy SD64 is located outside the current settlement boundary in a biodiverse flower-rich hay meadow that has been described in the Local Plan as having a *“settlement separation function”*. The Development Brief requirement that *“it must create a ‘full stop’ to the settlement of Coldwaltham”* is therefore deeply ironic, and does nothing to allay concerns that SD64 represents the ‘thin edge of the wedge’; it will be only a matter of time before more of the meadow is lost and the two settlements will eventually coalesce to form a small town. In this context, SD64 is not effective, because it is not deliverable. It lacks coherence with point 3 and 4 of Strategic Policy SD4, supporting text 5.16 and NPPF 117. In allocating SD64, the National Park is severely damaging a natural and cultural heritage feature that is currently making a positive, distinctive contribution to landscape character. This is in conflict with point 5 of Strategic Policy SD4.

1.5 The NPA considers that *“Although some landscape impact is inevitable, views from the A29 to the Arun Valley and South Downs scarp can still be retained and transition to new countryside edges can be achieved, all through good design.....There is no conflict between on the one hand encouraging new homes to front on to the A29 while at the same time wanting to retain views south through the development site to the South Downs scarp (which could be through the access road) ...these objectives are not mutually exclusive.”* (SDNPA Coldwaltham Development Brief Responses 5 & 12, Nov 18.) This is confirmation that the landscape of the National Park will be compromised by SD64. The suggestion that it will be possible to view the scarp slope of the South Downs in all its glory by seeing through or around 30 houses or by viewing it from the access road into the development, and that this will be made acceptable by good design, is derisory. The loss of our views and the damage to the landscape is not inevitable; it can be completely avoided by locating development elsewhere on alternative, more appropriate sites that have come forward in the village.

Location

2. Allocation Policy SD64 is not *“in line with the spatial strategy of the Local Plan for a medium level of development across the towns and villages of the National Park”*, which is why it features in Table 2.7 of the SDNPA SA, which features departures from this spatial strategy. As we have shown in our analysis of all the allocation policies in the Local Plan, (in our representation to SD25), SD64 is a disproportionate allocation. It has the largest amount of land (8.1ha) within the National Park and the 30 houses allocated will increase the number of dwellings in Coldwaltham village by 12%. *Pro rata* the population of the National Park, SD64 is five to six times greater than it should be for a rural village of our size, and is 50% larger than any other rural village allocation in the East and West Sussex part of the National Park.

2.1 SD64 is not supported by an extensive and robust evidence base. With a Site Facilities Assessment of just 2.5, the village is not a sustainable location for such a large increase in the number of dwellings. There is no bus service worth the name, for the part-time bus service is unsuitable for commuting and the railway station is over 2.5 miles away. SD64 will inevitably generate increased car use around the village and on the busy A29, particularly if the proposed shop is commercially viable enough to be built.

2.2 Although SD64 specifies a shop in order to enhance the services in the village, *“neither this policy nor development brief requires a shop. This would be a matter for developer and would depend on viability.”* (SDNPA Coldwaltham Development Brief, Response 2.) Village shop have failed in the past and we doubt that this one will be viable enough to be built or succeed.

2.3 Such a large new estate, in a village that has so few services, will have at best a *“marginal effect”* on the local economy (Envision technical report, 2015 & 2017 update), for there are limited opportunities for employment in the village. Policy SD64 is likely to have social costs, for there has been a history of incremental, separate estate development within the village, which makes community cohesion difficult. An additional estate, outside the current settlement boundary, will exacerbate this. A much smaller number of houses, located on the other sites that have come forward within the village, would better facilitate social integration, and development on the other sites would be easier to integrate with the village’s landscape character. These sites have the added advantage of avoiding the environmental and landscape impacts associated with SD64.

2.4 SD64 is a major development by reason of the size of the allocation in relation to the village, its potential for likely adverse impacts upon the landscape and its impacts upon the integrity of the adjacent designated sites. (Envision Technical Report 2015 & 2017 update). Major Developments are not appropriate in a National Park, especially when there are no Imperative Reasons of Overriding Public Interest to justify them (SDNP LP Policy SD3, point 2). The fact that SD64 will not convey anything other than a marginal economic benefit to the local community and that other sites have come forward for development in the village, makes it impossible to justify SD64 on IROPI grounds. The Horsham District Council SHLAA 2014 reveals that there is a surplus of housing for the next ten years without including any sites at Coldwaltham, and the villages of Amberley and Washington (the other two villages in the Horsham part of the National Park) both have Neighbourhood Development Plans to meet their need.

Biodiversity

3. SD64 is situated in a semi-improved flower-rich hay meadow that has been managed as Target Habitat Grassland for its floral component under the HLS agri-environment scheme for the past ten years. Meadows like this have largely disappeared from the UK countryside, 97% of them having been lost since the 1930s, mostly as a result of modern farming methods. As such the meadow is a cultural heritage asset. Although not currently a Habitat of Principal Importance, the meadow has benefited from an appropriate land management regime that is in line with Objective 9v of the Neutral and Acid Grassland Habitat Action Plan for Sussex and is wholly consistent with its inclusion in the Sussex Biodiversity Partnership’s

Houghton to Coldwaltham Biodiversity Opportunity Area: *“BOAs identify the most important areas for wildlife conservation in Sussex, where targeted conservation action will have the greatest benefit to wildlife. The main aim within BOAs is to restore biodiversity at a landscape scale through the maintenance, restoration and creation of BAP priority habitats.”* (Biodiversity and Planning in Sussex, 4a, SWT)

3.1 We have detailed in our representations and position statements (Matter 8: Biodiversity, and the PS for the Preliminary Ecological Appraisal of the meadow), the meadow is intrinsically biodiverse by virtue of its size, location (it is a unique part of the rich mosaic of habitats within the Arun Valley) and the rich wildlife communities it supports, including various BAP species. The meadow is a functionally linked foraging habitat for the Barbastelle bats of The Mens SAC and serves as a vital buffer for the internationally important Arun Valley SAC/SPA/Ramsar site, from the negative impacts of recreational pressure and urbanisation.

3.2 Ecosystem Services are ‘the benefits people gain from nature’, and the Local Plan indicates that *“EcoServe GIS was first used to identify which allocations are located in areas that provide multiple ecosystem services and are therefore particularly important...”* (9.10). We would thus expect, from the biodiversity of the meadow and its interrelationship with the designated sites, that the criteria for Policy SD64 should include a plethora of Ecosystem Services Icons, but none are shown, despite comments made by us that this drastically underrepresents the natural capital of the site. However, the Development Brief for Policy SD64 attributes 21 out of a possible 22 Ecosystem Services to the site (Fig 2.4). Allocating such an area for development is therefore against NPPF 110: *“In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with least environmental or amenity value, where consistent with other policies in this framework”*. Policy SD64 is not coherent with this guidance, or the Precautionary Principle or the First Purpose of the National Park.

3.3 The conservation and enhancement of biodiverse undesignated sites, such as this meadow, is a key recommendation of the Lawton Review, which coined the mantra “more, bigger, better and joined” (Making Space for Nature, p.3, Defra 2010), and the 25 Year Environment Plan makes a repeated commitment to increasing the nation’s wildflower meadow resource. The biodiversity of the site is recognised by Natural England (source: NE FOI requests & Statement of Common Ground between the Sussex Wildlife Trust and SDNPA in regard to draft allocation SD64, Appendix 2) and is corroborated by Local Plan representations made by RSPB and The Sussex Wildlife Trust. The meadow is clearly unsuitable for development in terms of landscape and biodiversity; alternative sites have come forward in the village without the environmental constraints outlined above. Other National Parks make proactive attempts to conserve and enhance wildflower meadows in pursuit of their Purposes, and we cannot understand why this National Park has decided not to do the same.

3.4 Instead, we find that the National Park Authority appears resolutely determined to promote the development of the meadow, adopting a “what can we get away with?”

approach to conserving and enhancing biodiversity, that is at odds with the First Purpose of the National Park:

3.4.1 SD64 has been located as close to the adjacent designated site as NE Impact Risk Zones will allow, which is why the SA assessment of its impact on biodiversity is “*uncertain effects*”. There is nothing uncertain about the negative impacts of recreational pressure and urbanisation upon the meadow and the SAC/SPA/Ramsar Site, particularly when the “*possible solutions*” outlined in HRA 4.11.2 & 11.2.1 and SD64 9.48 have already been proven to be ineffective in dealing with existing levels of disturbance (leaflets & signage already exist) or undeliverable; “Dog Ambassadors” cannot prevent dog walkers from using public footpaths or legally enforce ‘dogs on leads’, cannot be present all the time and cannot change the behaviour of unaccompanied dogs. The ten-year management burden survey, which would trigger compensation payments if damage was proven, as outlined in HRA (*ibid*) and SD64 9.48, is not mitigation, for the damage will have been done and will continue indefinitely after the houses have been built; no amount of payment would compensate for this.

3.4.2 As indicated in our representation to the HRA and our position statement for Matter 2, the HRA repeatedly attempts to downplay the potential adverse impacts of siting 25-30 houses within c100m of the designated sites. Instead of assessing the impacts of 30 houses, which would be in line with the Precautionary Principle, 28 houses are cited and this is repeatedly referred to as a “small amount”.

3.4.3 The HRA misapplies a NE recreational impacts assessment of ‘no concern, because not an issue’, given for a part of the designated site that has access restrictions, to a different part of the site that allows visitor access. This was then used to justify the assertion that “such a small number of dwellings will not result in a material change in recreational activity at the site” (HRA p.30).

3.4.4 Statistics concerning dog ownership are also ‘rounded down’ in the HRA in order to downplay potential negative impacts of predation and disturbance, when it should be recognised that it only takes one uncontrolled rogue dog to wreck havoc with grazing livestock or roosting wildfowl.

3.4.5 Key reference documents concerning the foraging and commuting behaviour of Barbastelle bats are repeatedly misquoted in the HRA in an attempt to downplay the importance of losing c35% of functionally linked foraging habitat for the Barbastelle bats of The Mens SAC.

4. A Preliminary Ecological Appraisal has been provided by the NPA, which we have challenged in a Position Statement, on the basis of its inappropriate methodology, inaccuracy of results and interpretation of data. As detailed in our position statement on Matter 8, we find it perverse that a 50% loss of habitat, due to a combination of land-take and change of use to public open space, is claimed in the report as a net biodiversity gain because the remaining half of the meadow will be “enhanced” by a management regime that is effectively a continuation of its current management. This flawed ecological assessment is then cited by the NPA as justification for the assertion that SD64 “*would not*

impact on the nearby on the nearby Waltham Brooks/Arun Valley site” and that “the proposed enhancements will greatly outweigh the negative impact of losing a relatively small area of semi-improved grassland...[they] will result in significant gains in biodiversity.’ The report did not refer to the recreational disturbance that would be associated with SD64, which is why, despite the statement of common ground that has been signed between the NPA and the Sussex Wildlife Trust, the SCG states *“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.”* and that *“The SWT do not think the benefits of the allocation outweigh the harm.”* So much for biodiversity gain.

4. 1 We have demonstrated above that in allocating SD64, the National Park Authority is pursuing its Duty at the expense of the First Purpose of the National Park. SD64 lacks coherence with so many Core and Strategic Policies that it renders the Local Plan unsound. SD64 should therefore be withdrawn because it cannot be modified to make it sound. As we have stressed throughout, there are other sites available in the same village that could deliver the same benefits without the environmental constraints we have outlined.

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