

# Coldwaltham Meadow Conservation Group

## Position statement relating to three new SDNPA documents, which relate to Matters 7, 8, and 11:

1. Development Brief for Land South of London Road Coldwaltham November 2018
2. Schedule of responses to Public Consultation (March 28 to April 26 2018) SDNPA supplied to CMCG on 20 November 2018.
3. Outline Meadow Management Plan agreed between SDNPA and the Barlavington Estate.

### Development Brief

1. We have commented at length about previous versions of the Development Brief; we now comment on some remaining issues in the new November 2018 version:

### Landscape Impact: Site analysis Diagram 2.13 page 38

1.1 This diagram shows three arrows which are described in the Legend as “Views Across the site to the South Downs” if the person who drew these arrows had taken the trouble to enter the field and stand in the middle they would have drawn the arrows to the South and South West as well because the meadow is highly visible from a very extensive length of the South Downs Way.

### Design Principles Diagram 3.00, Page 42

1.2 This diagram shows three “New/Enhanced Hedgerows”, running roughly parallel straight down the field. Great play is made of the need for “new countryside edge” and Para 48, p.46, says that *“dwellings on the edge of the development should be arranged more informally, respecting the sensitive landscapes to the west and south”* This is not coherent with the analysis diagram referred to above, which only indicates views to the southeast. The DP diagram shows that the existing straight field margin will be replicated by another, almost identical new/enhanced straight field margin some 100m plus to the south west. The view from the road will therefore be pretty much the same, a tall hedgerow but the field will be much smaller. Just how this replication improves the so-called “current, poor quality settlement edge” (para 11, page 43) is questionable.

1.3 There are also a number of references in the Local Plan and the Development Brief about the development following the contours of the land. Yet all three hedgerows, which will dominate the landscape from both near and far, are simply straight lines cutting directly across all the contours.

1.4 This Development Brief dated November 2018 was sent to us on the same day as the Outline Meadow Management Plan that has been produced by the Barlavington Estate and the NPA. Although they were delivered at the same time they are different and we do not know which is the definitive version.

#### **Scale Massing and Form page 46.**

1.5 The claim that *“New residential development should reflect the traditional scale, form and massing of locally distinct architecture in Coldwaltham”* (para 56), is contradicted by subsequent paragraph 57, which states *“a mix of two storey”* houses and Paragraph 60, which states *“roofs should be steep pitched”*. It is true that the neighbouring 1930’s Brookview former Council Estate is predominantly two-storey houses with moderately high roofs, but the vast majority of house building in the village over the last 70 years has been much more sensitive to the landscape, resulting in predominantly single-story bungalows with low pitched roofs built mostly on lower ground. This, together with extensive tree planting in and around the gardens, has resulted in a remarkably well landscaped village, hardly visible from across the valley.

1.6 This effective landscaping is well illustrated by the photographs we have previously submitted, which show that very few of the 250 houses in Coldwaltham are visible from across the valley and from the village of Amberley. The photograph taken from the Sportsman public house shows just a few houses visible on the Brookland Way Estate. Unfortunately, there was a serious lapse in planning standards, (but nothing compared to the current lapse shown by the NPA in their Development Brief) when these council houses and flats were built with their partially white wooden exteriors and no tree planting. Although an eyesore to many, these council properties were at least built at the bottom of the meadow on lower ground than those which the NPA are advocating. These could at least be screened by tree planting, unlike the dwellings proposed in the Development Brief.

1.7 The NPA claims that the meadow SD64 is relatively flat but this is incorrect. Even their own map on page 26 (Topography and Water) Shows four contours within the meadow. The top of the field is at least 15 m higher than the lower part of the meadow, where the most recent council properties were built.

1.8 The mostly effective landscaping and screening of Coldwaltham is clearly seen from the top of the Downs along extensive lengths of the South Downs Way. Only a few properties are visible in both photographs. However, the top of the meadow where the NPA propose to build SD64 is all too clearly visible. The construction of 30 two-storey houses, with high pitched roofs, on the highest and most prominent meadow in Coldwaltham will stand out for miles around. It will be especially obtrusive in the landscape from across the valley in Amberley and even more so from the South Downs Way. Located at the top of the meadow, SD64 is actually 3 m higher than the adjacent land where the Brookview Estate is built; these neighbouring properties at the top of the Brookview Estate are in fact bungalows which makes them much less obtrusive.

1.9 Earlier versions of the Development Brief actually tried to partially address this issue with the proposal to plant tree screening and landscaping on the South Eastern higher part of the meadow where they are now proposing an open space recreation field. However now that the NPA have finally come to recognise the botanical importance of the meadow and the need to protect it, they have withdrawn their tree screening proposals and so there

will be no screening on the south west side and so the properties will also be visible from the neighbouring village of Watersfield.

1.10 The latest proposals suggest that there should be tree planting/screening actually within the proposed development, but even after very many decades, the fastest growing native trees will fail to screen any high houses at the top of the meadow. The NPA are determined to create a permanent eyesore in this iconic rural landscape and many generations to come will regret this folly.

### **Comment on Schedule of Responses to Public Consultation Land South of Road, Coldwaltham Development Brief, by Representation Number and Topic**

**2. No market for shop.** The text change; “shop, if proposed” reflect the local scepticism about this ‘enhancement’ of services. There is little need for a local shop, other local shops have failed and this site is so far from most of the village that they will need to drive to it. Shoppers will continue to drive to Pulborough where there are large Supermarkets with much greater choice. We can see no reason why any developer would choose to build a shop here and so there is not likely to be any increase in our village facilities. A shop it seems, is an empty ‘sweetner’.

**3 Impact on Biodiversity too great.** The response claims that the proposed development will be on less than a quarter of the site area but the plans show it be more than one quarter. The loss of meadow habitat will be even greater, with the area of extended and thickened hedgerows, scrub margins and the woodland planting around the Sewage works to reduce the sight and smell.

**4. Too many housing numbers for local amenities and road infrastructure.** The response fails to address the lack of local amenities.

**5. impact of the development on the landscape too great.** The response acknowledges “Although some landscape impact is inevitable, views from the A29 *“can still be retained”* but how it will be possible to see through or around 30 houses is not explained. The view across to the Downs from more than half the field will be extensively blocked by 30 houses. As we have already pointed out, the new countryside edge will simply be another straight hedge not unlike the existing one; there is no mention at all of the huge blot on the landscape that 30 houses on the most prominent field in the whole parish will have for everyone across the valley and along the South Downs Way.

**9. Requires confirmation that at least 50 % affordable housing.** The response that “the local Plan once adopted, will set the affordable housing required” is unacceptable to local people, who want confirmation now.

**10. Clarity required on how development will stop on the edge of the settlement.** The response gives no clarity, quite the opposite in fact with the reference to *“Development should be arranged more informally...following contours rather than straight lines”*. So why

the proposed straight hedgerows, cutting across all the contours, on the Design Principles Diagram?

**11. Clarity over scale and location of non-residential parking.** The response makes no reference to the likelihood that there will be no shop, we need an assurance that there will be no non-residential parking in the event that there is no shop.

**12. Views of the South Downs scarp from the A29 should be retained.** The response that *“there is no conflict between on the one hand encouraging new homes to front onto the A29 while at the same time wanting to retain view south through the development”* makes no sense, building 30 tall houses within a 100m wide strip of land will obviously block off most of the view.

**13. Dark skies policy needs to be strictly enforced including lighting for lighting associated with shop.** The response is completely inadequate. And on page 44, it actually states *“Low level bollard lighting should be used, only if essential”* The NPA do not seem to understand the meaning of Dark Skies. Our Parish is proud of the fact that we do not have street lighting, why could it be essential on this new estate? What about the Barbastelle bats, that avoid lighting of any kind? How will the developer, or the NPA, stop the new house owners installing patio, security and garden lights?

**14. Applicants must consult with local community.** Well the NPA are fine ones to talk, we have had no consultation so far!

**18. Development will be highly visible from South Downs Way.** The response that *“if well designed should not need to be screened from key vantage points”* assumes that a new townscape would be perfectly acceptable in an iconic rural landscape. Even the finest possible design cannot justify the sudden appearance of very prominent two-storey houses with high pitched roofs at the top of the meadow. It is not just the views from key vantage points that they need to be concerned about, it is the views from a large number of houses in Amberley and along extensive lengths of the South Downs Way. Also see earlier comment on this issue.

**19. Objection to impact of 2 storey development.** The response that *“single story development is an inefficient use of land”* demonstrates once again that this is nothing like a Landscape led Plan. The statement that *“2 storey homes are characteristic of Coldwaltham”* is incorrect. More than two thirds of the village is dominated by single-storey bungalows with low pitched roofs (see attached plan). This is also well illustrated by the photographs we previously submitted that show few houses are currently visible from across the valley or from the top of the South Downs scarp because they are bungalows surround by trees.

Map showing extent of Bungalows in Coldwaltham (Shown in Black)



**21. What is to stop further development occurring in the future.** The response that three quarters of the site retained as meadow would become open public space, conflicts with the draft management plan that NPA have agreed with the Barlavington Estate. A little more

consistency here might help the NPA to be a little more convincing. The fact that “no further extension of Coldwaltham is proposed “ is no assurance at all, there is nothing to stop further development in the future.

**23. Nobody who is on a low income will be able to afford to live there.** The response “a significant proportion” is simply not adequate, the NPA have said elsewhere that they want 50% affordable houses, why won't they say so here?

### **Comment on the Outline Meadow Management Plan**

i. Although the plan recognises the biodiversity value of the meadow, it nevertheless assumes housing development over a substantial part of the Meadow. No area for the development is given in the text but the drawn plan shows an area of approximately 2.1ha which is more than a quarter of the meadow. The drawn plan also shows the remaining meadow divided into two separate meadow areas with extensive new hedgerow planting, none of which is shown in the November 2018 Development Brief which was produced and released at the same time. This lack of coherence between the two plans is very worrying; which version is correct? The Outline Meadow Management Plan also shows 2m field margins, an area of woodland and hedgerow that will take up a significant area of the meadow.

ii The Plan makes no provision for who will manage the land, but it does state that the proposed enhancements are the responsibility of the Barlavington Estate to implement. It also states that this responsibility passes in perpetuity to any future landowner of the site. There is no mention of any mechanism that will ensure that the site is managed effectively in perpetuity and no indication that the SDNPA will play any part in the future management. This lack of any assurance or mechanism is deeply worrying. It would be entirely inappropriate and unacceptable to leave the future management of the whole site in the hands of the owner/developer. In the very unhappy event of such a wholly inappropriate development going ahead it would be essential to secure sustainable management with secure funding and full legal protection that would ensure that the land was effectively managed to delivered its full biodiversity potential, and that further development was ever possible on any remaining part of either field.

30.11.2018

