# Hassocks Neighbourhood Plan Proposed Local Green Space Sites



Regulation 14 Pre-Consultation Plan

NPWG Response Paper

June 2016



## Introduction

This report has been prepared in support of the proposed allocation of seven sites as Local Green Space as described in Policy 3 of the Hassocks Neighbourhood Plan (Regulation 14 pre-Consultation, January 2016). Local Green spaces can be designated as part of the Neighbourhood Plan provided they meet criteria described in Paragraph 77 of the National Planning Policy Framework (NPPF), which are set out below:

- 'where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a
  particular local significance, for example because of its beauty, historic significance,
  recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- where the green area concerned is local in character and is not an extensive tract of land.'

Policy 3 of the Neighbourhood Plan states:

## **Policy 3: Local Green Spaces**

The Neighbourhood Plan designates the following locations as Local Green Spaces (as shown on the Proposals Map);

- Land to the north of Shepherds Walk (LGS1)
- Land at the Ham (LGS2)
- Undeveloped land south of Clayton Mills (LGS3)
- Land to the east of Ockley Lane (LGS4)
- Land at South of Downlands (LGS5)
- Land to the west of the railway line (LGS6)
- Land at Pheasant field (LGS7)

Development proposals, which conflict with the purpose of this designation, will be resisted in these areas.

A copy of the Proposals Map showing the seven proposed Local Green Spaces is included overleaf.

The Regulation 14 Pre-Consultation Neighbourhood Plan has been issued for consultation and a number of objections and representations have been made in relation to the seven proposed Local Green Spaces. A substantial number of broad representations in support of the allocations were received.

This paper has been prepared in support of the Neighbourhood Plan in order to present the case for designation and to address specific comments raised by Consultees in response to the proposed designations.

The report is set out in two Parts.

Part 1 comprises the original paper prepared a part of the Evidence Base in support of the proposed Neighbourhood Plan which assesses each of the proposed sites against the NPPF criteria;

Note: Part 1 of the LGS assessment has been updated to address points of accuracy raised by land owners.

Part 2 comprises a response to the objections raised as part of the Regulation 14 consultation in relation to individual sites

The original paper prepared in as part of the evidence base to the Neighbourhood Plan assessed nine possible greenspace sites. Seven sites are proposed for designation. The designated LGS number has been added to the original paper for clarity. Aerial photographs locating the individual sites and photographs of each site have also been added.

- A number of comments and observations were made during the Regulation 14 Consultation as to whether the proposed LGS sites met the following NPPF criteria: the site must be 'in reasonably close proximity to a local community'
- The site must not be 'an extensive tract of land'

Text dealing with these specific points has been added

All documents have been prepared by Virginia Pullan (BSc, MA, CMLI) and David Withycombe (BSc, MSc, MLI) as co-opted members of the Neighbourhood Plan Working Group. This paper should be read in association with the following documents which also form part of the evidence base to the Neighbourhood Plan:

- Hassocks Parish Landscape Character Assessment
- Hassocks Parish Strategic Views
- Hassocks Parish Cultural Heritage
- Hassocks Parish Townscape Assessment
- Hassocks Parish Wildlife Asset Identification

# Part 1: Paper prepared in support of the Regulation 14 Neighbourhood Plan

## Proposed Local Green Spaces (LGS) and Enhanced Footpaths (EP)

### **Introduction**

As part of the neighbourhood Plan process a Parish can designate areas of Local Green Space (LGS). A LGS is required to satisfy the following criteria:

- It must be "in reasonably close proximity to the community it serves"
- It must be "demonstrably special to a local community"
- It must "hold a particular local significance" because of at least one of the following:
  - Beauty
  - Historic significance
  - o Recreational value (including as a playing field)
  - Tranquillity
  - o Richness of its wildlife
- It must be "local in character"
- It must not be an "extensive tract of land"

The NPWG has identified nine potential LGS sites within and around the village. Each site has been allocated an LGS number as shown on the LGS Plan. A number of these sites have also been considered as potential housing allocation sites. For ease of cross reference where sites or parts of sites have been considered for housing allocation the housing allocation site number (HA..) is also given in the descriptions below. All land owners have also been written to in order to determine whether they would be happy for the individual sites to be considered as a potential LGS. A summary of the responses received to date is included at the end of this report. The responses received have been taken into account in this assessment.

The NPWG has undertaken a review of these sites to assess the degree to which these potential sites meet the LGS criteria set out above. All of the sites are considered to meet the following criteria:

- It must be "in reasonably close proximity to the community it serves"
- It must be "demonstrably special to a local community"
- It must be "local in character"
- It must not be an "extensive tract of land"

The sections below provide a description of each of the nine LGS candidate sites, together with a discussion as to the "local significance" of each site.

The concluding section provides a "traffic light" assessment of each site with reference to the above criteria and also takes account of the following:

- The preferences expressed by the local community at the last housing consultation
- The overall recommendations of the NPWG as regards the allocation of individual sites for housing
- Responses received from land owners

The purpose of the traffic light assessment is to consider the sites in the light of the requirements of the NPPF that the LGS designation should be consistent with 'the local planning of sustainable

development', specifically in the case of the Neighbourhood Plan sites recommended for allocation for housing.

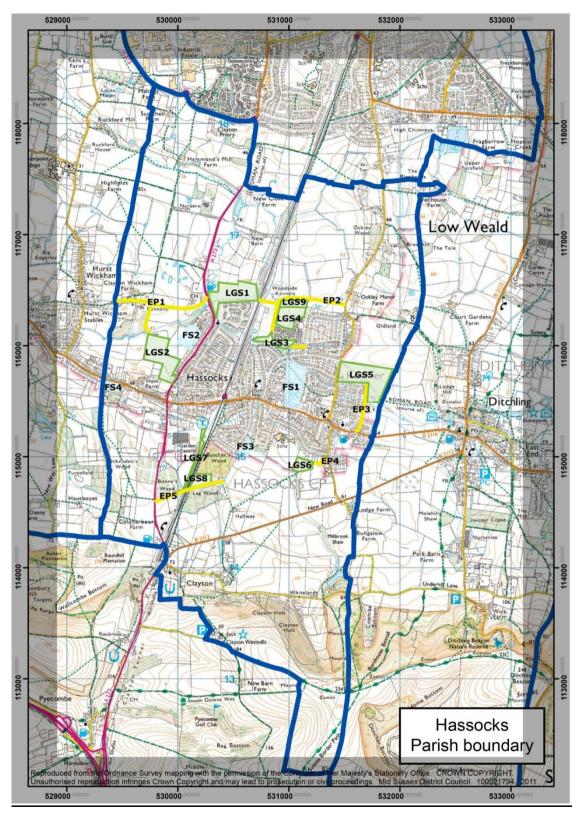


Figure 1: Proposed Local Green Spaces and Enhanced Footpaths

#### Individual Site Descriptions and Local Significance – Discussion

## LGS1 (HA Site 9) - Policy 3 designated as LGS1

#### Site and Location

This is an area of two fields to the north of Shepherds Walk and an adjoining area of public open space to the west of Shepherds Walk. The open space is an informal area adjacent to the Herring Stream. Local residents have put forward a written case for designation of the fields as local green space. There is a planning application pending for housing on part of this site.



#### **Public Access**

A public footpath crosses the area from west to east and the fields have been used by local residents as informal access for many years. . It is recognised that apart from the public right of way across the area the current open access is at the discretion of the landowner.

# Criteria for designation as LGS

## **Reasonable Proximity to a local Community**

The land lies on the northern edge of Hassocks and adjoins an area of housing to the south. There is access to the land via a footpath. It is, therefore, considered to be in reasonable proximity to a local community.

#### An Extensive Tract of Land

The site comprises two medium sized fields linked by a public right of way. The site is enclosed by a hedgerow to the north, the railway to the east, housing to the south and London Road to the west, creating a defined landscape parcel. It is, therefore, not considered to be an extensive tract of land.

# Landscape character and views

There are views across the area from the public footpath and from the adjacent houses. The area has an unspoilt rural character. The winding channel of the Herring Stream forms the western boundary of the area. The fast flowing Herring is in a deep channel and is a focal point of the area. Mature trees along the stream channel, willows and alders, enhance the visual and landscape value of the stream.

#### Heritage significance

The mature trees and hedgerows which define the field boundaries in this area suggest this is an historic landscape.

## Wildlife significance

The ancient hedges and mature oak trees are a potential habitat for a diverse range of species. The woodland on the railway embankment and the Herring Stream which form the boundaries to the area are also rich in wildlife. The wet meadows in the flood plain of the stream are a valued habitat.

The area is used by local people for informal recreation and is highly valued for its rural character and tranquillity. The public footpath is part of a longer distance route between Ditchling and Hurstpierpoint and is part of a circular route around the village.

## LGS2 (HA Site2) Policy 3 designated LGS2

#### Site and Location

These fields lie to the west of London Road and are part of Ham Farm. The eastern field is part of a site that was recently refused permission for residential development at appeal and a revised application is currently pending. The area is highly valued by local residents and walkers.



#### **Public Access**

The fields are crossed by a public footpath and are used for informal access by local people. This right of way gives access to the golf course and the circular path around the village. It is recognised that apart from the public right of way across the area the current open access is at the discretion of the landowner.

#### Criteria for designation as LGS

## **Reasonable Proximity to a local Community**

The land lies immediately to the west of properties on London Road, on the western edge of the village. The site also partially adjoins Belmont Recreation Ground and the golf course to the north and is overlooked by properties to the south. There is direct access from the residential areas on London Road via a footpath. It is, therefore, considered to be in reasonable proximity to a local community.

#### An Extensive Tract of Land

The site comprises two medium sized fields linked by a public right of way. The site is enclosed by properties on London Road to the east, the golf course and Belmont Recreation Ground to the north and existing fields to the west and south. The site benefits from a relatively enclosed character and it is, therefore, not considered to be an extensive tract of land.

## Landscape character and views

There are views across the area from the public footpath and from the adjacent houses on London Road. The area has an unspoilt rural pastoral character with mature trees and hedgerows. There is a key viewpoint from the edge of the Hurst Wickham ridge which affords views south across the area and beyond to the downs.

#### Heritage significance

The area has rich archaeological potential with evidence of prehistoric, Bronze Age and Roman remains. There is a possible Roman cemetery and a Romano-British Settlement at Ham Farm. The area has the central section of an archaeological notification area as the route of the Roman Road from Ham Farm to New Close Farm, Hassocks.

## Wildlife significance

There is wildlife value in the mature hedgerows, grazing land, hedgerows and mature trees. Barn owls are often seen hunting the fields in this area.

#### **Recreational value**

The area is used by local people for informal recreation and is highly valued for its rural character and tranquillity. The public footpath links to a circular route which runs around the village.

# LGS3 (HA Site 20) - Policy 3 designated LGS3

#### Site and Location

This linear site links Grand Avenue with Woodsland Road and lies to the south of the new houses in the Clayton Mills estate. Part of the area south of Clayton Mills is a public open space and the other half was set aside for a health centre.



#### **Public Access**

The area is accessed by the public footpath which follows a stream running west to east. Part of the area is public open space associated with the Clayton Mills development and the rest is woodland separated from the footpath by the stream. This is an important footpath link between within the village linking Clayton Mills to Adastra Park.

## Criteria for designation as LGS

## **Reasonable Proximity to a local Community**

The site is enclosed by residential development to the north and south and forms an important green corridor adjoin the stream. A public footpath runs alongside the stream. The site is, therefore, considered to be in close proximity to a local community.

# **An Extensive Tract of Land**

The site comprises a single, enclosed small field bordering a stream. The site is, therefore, not considered to be an extensive tract of land.

#### Landscape character and views

The area is an important green infrastructure corridor in the centre of the village. The mature trees and streamside footpath are an attractive recreational link through the northern residential part of the village. There are limited views from the area as it is enclosed by trees.

# Heritage significance

This corridor is part of an historic footpath link following the stream through the village from Ockley Lane via Adastra Park to Woodsland Road. This also links to the circular route around the village.

## Wildlife significance

The stream and associated mature trees are a valuable wildlife corridor. The land set aside for the health centre has become overgrown and has wildlife potential.

This area is of high recreational value as a green corridor with associated footpath and open spaces.

## LGS4 (HA Site 13) - Site not designated as LGS

#### **Site and Location**

This is an area of land which was part of landscape planning condition to be open space to serve the new development at Clayton Mills. This has never been fully implemented. The northern part of the area is a ploughed field bounded by a public footpath to the north.



#### **Public Access**

The site has open access and a pubic footpath crosses the area form south to north and joins the east west footpath on the northern boundary.

# Criteria for designation as LGS

## **Reasonable Proximity to a local Community**

The land is bordered to the south and east by existing residential development, with public access via an existing footpath providing direct access to the land from the residential areas to the south. It is, therefore, considered to be in reasonable proximity to a local community.

#### **An Extensive Tract of Land**

The site comprises a single medium sized field on the edge of residential development. It is, therefore, not considered to be an extensive tract of land.

#### Landscape character and views

There are views for the area to the open countryside to the north and equally there are views back across to this area from the ridge of Burgess Hill. The character of the area has been changed by the development of Clayton Mills and would benefit from being brought into positive management.

# Heritage significance

An archaeological notification area covers the northern section of the area where possible Bronze Age and Roman remains have been found.

## Wildlife significance

There is a spring rising in land north of Mackie Avenue creating a wetland and continuing across the footpath as a stream. The hedgerow on the northern boundary has wildlife value as do the mature Horse chestnut trees at Woodside Grange. There is mature mixed woodland along railway line which supports mature oak trees.

The area has the potential to provide informal recreation with enhanced management. The existing large bunds are a deterrent to less able users of the site. The well-used footpaths crossing the area are valued for views to the wider countryside and as part of the circular route around the village.

## LGS5 (HA Site 8) - Policy 3 designated as LGS4

#### Site and Location

This site is two medium sized agricultural fields which lie to the east of Ockley Lane. Both fields are in private ownership. The owner of the western field has put the site forward for potential residential and school development.



#### **Public Access**

The fields are crossed by a public footpath which is well used as the route from Hassocks to Ditchling. The western field was laid to pasture for many years and was very popular with dog walkers as a circular walk. There is now a crop in the field and the main access is a wide path across the footpath through the middle of the field which is heavily used. The eastern field remains under pasture and there is an informal path around the perimeter of the field which is popular with local dog walkers. It is recognised that apart from the public right of way across the area the current open access is at the discretion of the landowner.

# Criteria for designation as LGS

#### Reasonable Proximity to a local Community

The land lies on the north eastern edge of the village with existing residential areas to the south and west. Three paths provide direct links to the neighbouring residential areas. This site is considered of particular importance to the setting of the village in views from the higher land in the vicinity of Oldlands Mill and Lodge Hill. It is, therefore, considered to be in reasonable proximity to a local community.

#### An Extensive Tract of Land

The site comprises two medium sized fields which are linked both physically by a footpath and visually with views across the land from the north west. The site is, therefore, not considered to be an extensive tract of land.

## Landscape character and views

The site is of high landscape value as it is within the boundary of the South Downs National Park. There are open views across the site from Ockley Lane towards Oldland's windmill and the greensand ridge and Lodge Hill in Ditchling.

# Heritage significance

The footpath corridor would have been an historic route between the villages. The distinct field boundaries and ancient trees would suggest this is a historic landscape and would have archaeological potential. The Roman road which ran west to east through the village is thought to have run just to the south of this area.

## Wildlife significance

Mature ash and oak trees are a feature on the field boundaries along with one fine hornbeam and the associated hedgerows provide wildlife corridors and potential roosts and navigational corridors for bats. The eastern most field is bordered by streams and a mature hedge to the east and south. The southern boundary of the eastern field adjoins an SNCI or Local Wildlife Site.

#### **Recreational value**

The well-used footpath crossing the area is valued for views to the wider countryside and as part of the circular route around the village.

## LGS6 (HA Site 5) - Policy 3 designated as LGS5

#### Site and Location

This field is part of the Downlands school estate which is not in regular use as a playing field but is used for long distance running events by the school. The school have allowed the Hassocks Amenity Association to use this field as the Community Field.



#### **Public Access**

The site has open access and is crossed by a public footpath.

## Criteria for designation as LGS

## **Reasonable Proximity to a local Community**

The land lies on the southern fringes of the village and is bordered by the rear gardens to properties on Dale Avenue to the north. A public footpath provides direct access to the land from Lodge Lane to the west. It is, therefore, considered to be in reasonable proximity to a local community.

## An Extensive Tract of Land

The site comprises a single medium sized field enclosed by woodland and hedges and a stream. It is, therefore, not considered to be an extensive tract of land.

## Landscape character and views

The site is of high landscape value as it is within the boundary of the South Downs National Park. There are wide open views to the scarp slope of the downs from Ditchling Beacon to Wolstonbury Hill from this area.

## Heritage significance

The heritage value of this area is largely unknown as there is a lack of investigative evidence. The field has never been ploughed and could therefore have archaeological potential.

#### Wildlife significance

The mature hedgerows on the north and south boundaries are of wildlife value. The western boundary a section of ancient woodland and a chalk stream which also have high wildlife value.

The area has high recreational value as a green field with open access and is used as a community field. The public footpath is part of the circular route around the village and is well used as it gives access to the downs and to Lag and Butchers Woods.

## LGS7 (Not considered for Housing Allocation) - Policy 3 designated as LGS 6

#### Site and Location

This is a strip of land to the west of the railway which links the village centre at Keymer Road to the public footpath at Misty Bridge.

#### **Public Access**

There is informal pedestrian access through this corridor.

# Criteria for designation as LGS

### Landscape character and views

The corridor runs through the built up area to emerge near the garden centre into a wooded corridor and an open field. There are views to the downs to the south.

# **Reasonable Proximity to a local Community**

The land lies on the southern edge of the village and forms a narrow green corridor adjacent to the railway line. The site forms an important potential link from the residential areas to the north to the footpath network and wider countryside to the south. It is, therefore, considered to be in reasonable proximity to a local community.

#### An Extensive Tract of Land

The site comprises a narrow wooded corridor. It is, therefore, not considered to be an extensive tract of land.

## Heritage significance

The railway corridor and Misty Bridge are of local heritage significance.

#### Wildlife significance

The woodland adjacent to the railway is designated as ancient woodland and the field to the south is unimproved meadow.

#### Recreational value

This corridor could provide a much needed cycle and footpath link from the west side of the village and station to the Downs. This has been a long term aspiration for the community.



## LGS8 (Not considered for housing allocation) - Policy 3 designated as LGS 7

#### Site and Location

This field sits between the woodlands of Butchers Wood and Lag Wood which are designated as semi- natural ancient woodland. The current owners also own Lag Wood and are managing the area for their own pleasure as a natural area and wildlife asset.



#### **Public Access**

It is recognised that apart from the public right of way across the area the current open access is at the discretion of the landowner.

## Criteria for designation as LGS

## **Reasonable Proximity to a local Community**

The land lies on the southern fringes of the village and is bordered by the Butchers Wood to the north and Lag Wood to the south, but less than 0.5 kms from the nearest residential area to the north. The site is a popular area for local dog walkers, with access from the residential areas to the north via a footpath known locally as the 'cinder track'. It is also located on a well-used circular walk around the southern edge of the village. It is, therefore, considered to be in reasonable proximity to a local community.

## **An Extensive Tract of Land**

The site comprises a single medium sized field enclosed by woodland and the railway line. It is, therefore, not considered to be an extensive tract of land.

## Landscape character and views

The site is of high landscape value as it is within the boundary of the South Downs National Park. There are views across the area to the surrounding woodland and longer views to the downs. The area is tranquil as it is remote from the village roads and activity. The field has an unspoilt character as unimproved pasture surrounded by mature woodland.

# Heritage significance

The heritage value of this area is largely unknown as there is a lack of investigative evidence. As an unspoilt and intact area of landscape with historic meadow and woodland it has high heritage value.

# Wildlife significance

The unimproved meadow is a designated local wildlife site (SNCI) the value of which is further enhanced by proximity to ancient woodland (SNAW).

#### Recreational value

The area is highly valued by local people as an unspoilt, tranquil and accessible open space which is accessed by several public rights of way and from the Woodland Trust owned Butchers Wood.

#### LGS 9 (HA Site 4) - Site not designated as LGS

#### Site and Location

This area comprises a single ploughed field to the north of site LGS4. The field is bordered by post and wire fencing. A well-used footpath runs along the northern boundary linking to site LGS4.

#### **Public Access**

There is a public footpath running along the northern edge of the plot site, but there is no public access to the field which makes up the bulk of the plot area.



# Criteria for designation as LGS

## **Reasonable Proximity to a local Community**

The land lies on the northern edge of the village close to the housing areas at Clayton Mills and Mackie Avenue. There is direct footpath access to Clayton Mills and Lodge Lane. It is, therefore, considered to be in reasonable proximity to a local community.

#### An Extensive Tract of Land

The site comprises a single small field. It is, therefore, not considered to be an extensive tract of land.

## Landscape character and views

The field is bordered by fencing with a hedge to the north of the footpath. There are views from the area to the open countryside to the north and equally there are views back across to this area from the ridge of Burgess Hill.

#### Heritage significance

An archaeological notification area covers much of the site where possible Bronze Age and Roman remains have been found.

## Wildlife significance

The site is primarily a ploughed field bordered by fencing. The hedge on the northern boundary will have wildlife value.

#### **Recreational value**

The area has the potential to provide informal recreation with enhanced management and improved access. The existing footpath provides a link to the land to the north of Clayton Mills (LGS4) and also links to the wider footpath network to the east of Ockley Lane. The well-used footpaths is valued by local dog walkers and for views to the wider countryside and as part of the circular route around the village.

# **Conclusions and Recommendations (Revised 02.05.2016)**

The Traffic Light Assessment below combines the findings of the LGS assessment with responses received through the housing allocation consultation and the recommendations of the NPWG for the allocation of housing sites. Two sites (LGS 4/HA13 and LGS9/HA4) were subsequently adopted as housing sites as part of the Regulation 14 Neighbourhood Plan.

# "Traffic Light" Assessment for each site

| Traffic<br>Light | LGS Assessment Criteria             | Housing Consultation   | NPWG Recommendations                        |
|------------------|-------------------------------------|--|---|
|                  | Meets assessment criteria           | Site lies in group 11 to 15 in order of preference or not considered in referendum | Site not recommended for housing allocation |
|                  |                                     |  |   |
|                  | Partially meets assessment criteria | Site in 6 to 10 in order of preference   | Potential Housing allocation site           |
|                  | Does not meet assessment criteria   | Site in 1 to 5 in order of preference  | Site recommended for housing allocation     |

| LGS No, and<br>Housing<br>Allocation<br>(HA) site No. | Proximity to community | Special to<br>local<br>community | Local<br>Significance | Local in<br>character | Housing referendum assessment | Overall NPWG<br>housing<br>allocation |
|---|------------------------|----------------------------------|-----------------------|-----------------------|-------------------------------|---------------------------------------|
| LGS1 (HA 9)   |                        |                                  |                       |                       |                               |                                       |
| LGS2 (HA 2)   |                        |                                  |                       |                       |                               |                                       |
| LGS3 (HA 20)  |                        |                                  |                       |                       |                               |                                       |
| LGS4 (HA 13)  |                        |                                  |                       |                       |                               |                                       |
| LGS5 (HA 8)   |                        |                                  |                       |                       |                               |                                       |
| LGS6 (HA 5)   |                        |                                  |                       |                       |                               |                                       |
| LGS7 (N/A)  |                        |                                  |                       |                       |                               |                                       |
| LGS8 (N/A)  |                        |                                  |                       |                       |                               |                                       |
| LGS9 (HA 4)   |                        |                                  |                       |                       |                               |                                       |

All of the sites were considered to meet the NPPF criteria of being "in reasonably close proximity to the community it serves" and not "extensive tracts of land".

Two sites (LGS7 and LGS8) meet all criteria for allocation as LGS and were not considered potential housing allocation sites. Letters from the current owners related to the title for the land (LGS7) and the need for the designation (LGS8). These sites were recommended for approval as LGS sites.

Four of the LGS candidate sites (LGS1, LGS3, LGS4 and LGS9) were considered to have potential for allocation as housing sites by the NPWG. Sites LGS4 and LGS9 were recommended for allocation as housing sites and were therefore not considered as potential LGS sites, in accordance with the requirements of the NPPF. As part of the housing consultation, residents expressed strong opposition to the allocation of LGS1 (HA9) for housing. Site LGS1 is therefore recommended as an LGS. LGS3 is a very small site and the NPWG concluded that this site would not contribute substantially to housing numbers if allocated. LGS3 also offers significant benefits as an LGS being located within the residential area, providing a green, wildlife corridor with existing public access. It was, therefore recommended that LGS3 be designated as an LGS.

LGS2 was considered to meet all the LGS criteria and, although a potential housing site, there was strong opposition to allocation of the site at the housing consultation and is therefore proposed for LGS designation. Landowner correspondence questioned whether the site met the LGS criteria.

LGS6 was considered to meet the LGS criteria, although access is currently informal. Correspondence for the landowners sought further clarification on the purpose of the designation. The NPWG agreed to propose this site for designation.

Seven LGS sites were therefore recommended for designation and re-numbered as follows for the Regulation 14 Plan.

| Evidence Paper | Regulation 14 Plan |
|----------------|--------------------|
| LGS1           | LGS1               |
| LGS2           | LGS2               |
| LGS3           | LGS3               |
| LGS4           | Not designated     |
| LGS5           | LGS4               |
| LGS6           | LGS5               |
| LGS7           | LGS6               |
| LGS8           | LGS7               |
| LGS9           | Not designated     |

## Land owner Correspondence (responses received at 4th September 2015: Pre-Regulation 14 Plan)

#### LGS<sub>1</sub>

Letter from landowner opposing designation and stating that land is currently the subject of an application for housing.

#### LGS 2

Letter from Loxley Solicitors on behalf of land owner questioning whether LGS2 meets LGS criteria.

### LGS 3 and LGS 4

Letter from Barratt Homes indicating that Site LGS 4 is already designated as open space by virtue of Section 106 agreement but also confirming that site should be considered available for housing allocation.

Letter also questions evidence base for designation of both LGS 3 and LGS 4.

#### LGS 5

Letter from Batchelor Monkhouse on behalf of landowners requesting proposal is dropped at this stage.

#### LGS6

Letter from owners of LGS6 stating that the site is currently used as school playing fields and seeking further clarification on the purpose of the designation.

#### LGS 7

Letter from Persimmon Homes questioning title for land.

## LGS 8

Letter from land owners questioning the need for LSG designation as the land is protected by various planning and environmental designations.

## LGS9

Letter from Clifford Dann on behalf of land owner opposing allocation.

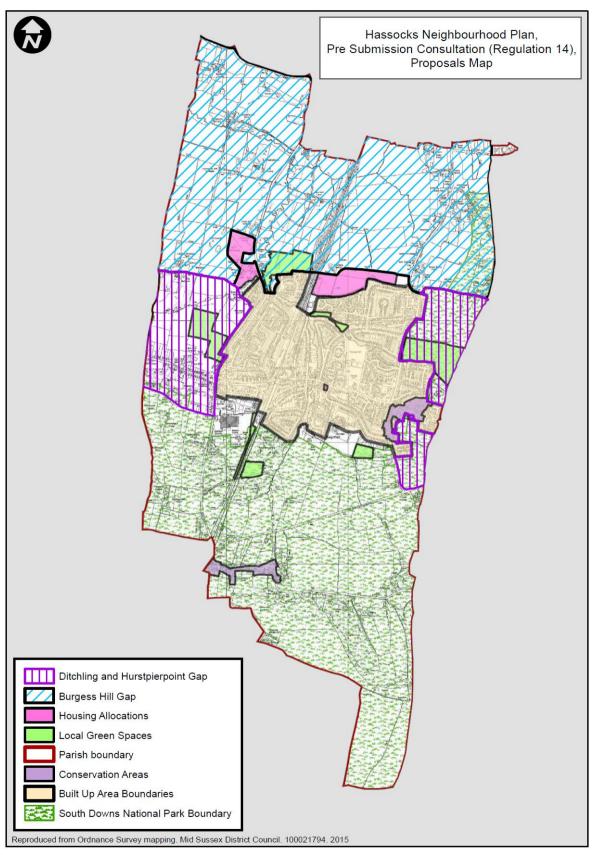


Figure 2: Proposals Map showing seven proposed LGS sites

# Part 2: Responses to Regulation 14 Consultation

## Introduction - Response on Policy 3: Local Greenspace (LGS)

The principal comment or objection in relations to the proposed designation of LGS relates to whether the sites are 'demonstrably special' as defined in Paragraph 77 of the NPPF.

This point is raised in the Stakeholder responses below:

126/139 In relation to all 9 (LGS 7 as allocated under Policy 3)

175 In relation to LGS2
 183 In relation to LGS 4
 184 In relation to LGS 1

The proposed designation of sites as LGS was underpinned by the background paper which considered the original 9 potential sites (see Part 1). This paper sets out the NPPF criteria and a methodology against which each site was to be assessed. All sites were agreed by the NPWG as being 'in reasonable proximity to the community it serves'

In assessing whether sites were considered 'demonstrably special' and 'hold a particular significance' sites were assessed against four criteria:

- Landscape character and views
- Heritage significance
- Wildlife significance
- Recreational value

Although no area was prescribed to define an 'extensive tract of land' it is our view that none of the proposed LGS could be considered an extensive tract of land.

The views of the local community were also built into the assessment through reference to the preferences expressed on housing site allocations.

The original assessment also detailed correspondence received from landowners.

No objections to the LGS policy and the background paper have been raised by Statutory Consultees. The principal comments from Statutory Consultees on the LGS policy are summarised below:

SDNPA 'The supporting evidence document 'Proposed LGS' appears to provide detailed justification for each preferred LGS.'

MSDC Minor comment on the wording but also add: 'In order to aid clarity. It is noted that a number of the sites being allocated for Local Green space have recent planning history, namely the Land at the Ham and Land to the North of Shepherds Walk. It is recommended that the Parish Council satisfies itself that the evidence on these two sites in particular is robust and can withstand a potential challenge.'

At a subsequent meeting MSDC queried the extent of LGS 1 (land to the north of Shepherd's Walk)

## Southern Water

Request addition of the following: 'Development proposals which conflict with the purpose of this designation will be resisted in these areas, with the exception of proposals for essential utility infrastructure, where the benefit outweighs any harm, or it can be demonstrated there are no reasonable alternative sites available.

Detailed responses to individual objections and representations against each site are set out below:

| Site and Stakeholder Letter  | Comments/Objections  | NPWG Response   |
|--|--|---|
| LGS 1 25 representations received in support of the designation (Stakeholder Refs: 4, 23, 45, 54, 93, 101, 102, 103, 106, 111, 112, 126, 129, 130, 135, 139, 140, 143, 149, 152, 159, 160, 165, 167, 182 | Support designation of LGS 1   |   |
| LGS 1 Stakeholder Reference: Letter from SIGMA Planning dated 15 <sup>th</sup> February 2015   | LGS1 is prejudicial to the sustainable development of the site for housing as proposed in current application.  The site is not in close proximity to the community it serves and is only accessible by a small part of the community. The footpath across the site is not widely used and it crosses the railway.   | There has been widespread objection to the proposals for housing development on this site from across the local community. This demonstrates that the site is valued by local people. Written evidence of its value and informal accessibility has been provided in a report compiled by the community. The site is immediately adjacent to the residential village edge and overlooked by houses.  The footpath is promoted as part of the circular walk around the village and as a longer distance route between Hurstpierpoint and Ditchling. |
| LGS 2 Land at Ham Fields Stakeholder Reference 175 Letter from Nexus Planning dated February 2016  | Policy 3: Objects to allocation of LGS2 part of which covers potential housing site 2. Go on to give reasons why should not be designated as such, 'not demonstrably special to the community'. EAD letter identifies that the ecological features of value within the eastern site do not warrant specific designation as Local Green Space. Does not meet para 77 of the NPPF. | In the region of 300 local people raised objections to the Ham Fields application. This in itself demonstrates how the site is valued by local people.  |

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|                             | Recommend LGS2 is removed from Policy 3.  |  |
|                             | None of the objectors to the Ham Fields application referred to the site as being in any way special or of particular local significance.  Consultation responses to the potential housing sites for the NP. As above assertion is that this opposition was mainly on traffic, strategic gap and pollution issues, not local significance or value. | In both consultations Ham Fields was consistently opposed as a housing allocation site. As above this in itself demonstrates how the site is valued by local people.   |
|                             | Landscape Character and views and recreational value. Reference to technical note prepared by Fabrik.   |  |
|                             | Site is not of exceptional landscape quality  | Landscape quality is not a requirement of LGS designation. Para 77 of LGS refers to sites being 'local in character'. LGS paper concludes that site does reflect local landscape character.                                |
|                             | Site is of limited recreational value   | Site is highly valued by local people as demonstrated by objections to Ham Fields application. In addition to use of the public footpath there has been (unchallenged) informal access to much of the land for many years. |
|                             | Site does not form part of a designated landscape   | As above landscape designation for scenic beauty or character is not a requirement of LGS designation.   |
|                             | Site is not considered tranquil   | Disagree. In central parts of site there is a good sense of tranquillity – limited urban intrusions in views, natural sounds eg birdsong   |

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|   | Open views are not considered to be of particular local significance   | predominate as opposed to traffic noise.  Agree – views are of <u>local</u> significance. Reflects designation as a <u>local</u> greenspace.   |
|   | Heritage significance  Refers to archaeological mitigation strategy in the event of development and no clear reasoning for identification of heritage significance   | Objection does not contest the heritage significance identified in the LGS paper.  |
|   | Wildlife Significance  Letter provides evidence from the EAD Ecology Assessment of the site and how features could be protected in the event of development. Letter argues that various features — hedgerows, mature trees, etc do not 'warrant designation as LGS'. | Objection does not contest the features of wildlife significance identified in the LGS paper. Agree that individual features might not 'warrant designation as LGS', but these features are of <u>local</u> significance and reflect <u>local</u> ecology and in combination strongly reflect local character. |
| LGS 4 Stakeholder Reference: 183 Letter from Agri-Matters dated 21 <sup>st</sup> March 2016 Stakeholder Reference 2 Letter from NFU dated 16 <sup>th</sup> February 2016 – note letter from NFU refers to the site as LGS 5 'Land at South Downlands' | LGS4 not suitable as LGS with regard to NPPF criteria  Recreational Value – Not merited as there is a single footpath running across the field and other informal paths are not recognised by the land owner.  | LGS paper cites valued views from the site. Informal paths have been used unchallenged for over 20 years.  |
|   | Historic significance – reference to archaeological surveys which would be undertaken in the event site is developed.  Richness of wildlife/Tranquillity – site is regularly cropped, proximity to development,  | Objection does not challenge heritage significance. Indicates how it might be conserved in the event of development.  Again objection does not challenge wildlife significance associated with boundaries and  |

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|   | regular pedestrian and dog access mean site could not be considered rich in wildlife or tranquil. Recognise value of mature trees and field boundaries.   | proximity to the stream and SNCI. Statement recognises the proximity of the site to the village which is a key consideration in LGS designation. These factors would not impact on wildlife. Site benefits from a high degree of tranquillity and sense of place.              |
|   | National Park Designation – As park benefits from NP status LGS designation is not necessary  | Disagree – LGS designation would serve a different purpose providing accessible green space for the local community. The LGS policy is not being used as a blanket designation – seven discrete sites are proposed spread around the edges of the village/settlement boundary. |
| LGS 5<br>Stakeholder Reference 2<br>Letter from NFU dated 16 <sup>th</sup><br>February 2016 | Object to the proposed designation of LGS5 "Land at South Downlands".   | This reference is probably confused with LGS4 (which was previously LGS5) as the land to the south of Downlands is not farm land but is in the SDNP.   |
| LGS 7 Stakeholder Reference :21 Letter from Land owner                                      | As owners of LGS7 object to the description given in the background document "Proposed Local Green Spaces (LGS) and Enhanced Footpaths (EP)".   |  |
|   | <ol> <li>Pheasant Field is not "Open Access" and we have not expressed any such wish</li> <li>Update wording to read; The area is being managed for wildlife conservation and the promotion of biodiversity.</li> <li>Wildlife Significance. The area is not an SNCI it is PART of</li> </ol> | <ol> <li>Noted and the background paper will be up-dated to reflect this.</li> <li>Noted as above.</li> </ol>  |
|   | <ul> <li>an SNCI</li> <li>4. Landscape Character and Views. Views of the downs are extremely limited.</li> <li>5. The text contains other errors, there is significant "investigative evidence" of</li> </ul>   | <ul> <li>4. There are some views to the downs and the report does not state that these are extensive.</li> <li>5. Noted and will check against the Historic Environment Record in</li> </ul>   |

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|                             | heritage value, ancient semi<br>natural woodland is<br>abbreviated to ASNW not<br>"SNAW", the SNCI is three<br>times larger than that<br>described here or on the map<br>in the document "Hassocks<br>Constraints and AQMA Radius<br>Map". | reviewing the background paper. The SNCI has been masked by the ASNW where this coincides on the map. This will be clarified in the text. |
|                             | The proposed LGS8 is not consistent with the AQMA Radius Map.  |   |
|                             | We object to any proposal to change the existing public footpath across Pheasant Field from a footpath to a bridleway or cycleway.   | This has not been suggested in<br>the background paper or the<br>Policy. This may be a confusion<br>with aspirations for LGS6.            |