

Matter 4: Hearing Statement

Mid Sussex Site Allocations DPD Examination in Public

On behalf of Welbeck Strategic Land (II) LLP

Matter 4: Hearing Statement

Mid Sussex Site Allocations DPD Examination in Public

on behalf of

Welbeck Strategic Land II LLP

May 2021

**DMH Stallard LLP
Griffin House
135 High Street
Crawley
West Sussex
RH10 1DQ**

**Tel: 01293 605192
Fax: 01293 605080
Email: Katie.Lamb@dmhstallard.com**

DMH Stallard LLP Ref: 296724-8

Appendices

- A. Heritage Note by Orion Heritage (May 2021)

1. Introduction

- 1.1 DMH Stallard LLP act on behalf of Welbeck Strategic Land (II) LLP (“Welbeck”) in relation to the Mid Sussex Site Allocations DPD (“SA DPD”) and the Examination in Public (“EiP”).
- 1.2 Welbeck have a Promotion Agreement with the landowner of Imberhorne Farm, Imberhorne Lane, East Grinstead, part of which is allocated at Policy SA20 of the SA DPD and is known as *Land West and South of Imberhorne Upper School, East Grinstead* (the “Site”).
- 1.3 Policy SA20 of the SA DPD allocates the Site for:
- 550 dwellings, including 30% affordable housing
 - C4 hectares (net) playing fields for Imberhorne Secondary School
 - Land for a 2FE Primary School (with Early Years provision)
 - A mixed use ‘hub’, to include potential for a GP surgery
 - A Care Village
 - C40 hectares of Strategic SANG
- 1.4 This Hearing Statement refers to Matter 4, as set out in the Inspector’s Matters, Issues and Questions (“MIQs”) – Document ID-02. It supplements the submissions made during the Regulation 19 Consultation (Doc ID SA20.10).

2. Are the Plan's provisions for the protection and enhancement of its environmental, landscape, biodiversity and heritage assets justified and in accordance with national policy?

*Are the **environmental, landscape, biodiversity and heritage** policies justified, effective and in accordance with national policy? Are any additional environmental policies needed?*

- 2.1 The SA DPD is the 'daughter document' to the District Plan, which details environmental policies. Welbeck are promoting land west and south of Imberhorne Upper School (Policy SA20). As part of that process, significant background site assessment has been undertaken to support the promotion of the site and its subsequent allocation, this is set out at documents SA20.1 – SA20.9. The evidence base supports the policy wording at Policy SA20.
- 2.2 A LVA supports the promotion of the Site (Doc ID SA20.3), confirming that the Site has a sense of physical enclosure and that development of the Site will not have a harmful impact on the wider countryside and landscape; Policy SA20 requires the retention and enhancement of landscape structure and field boundaries, which is supported by the indicative Concept Masterplan (SA20.1). Furthermore, the proposal offers the opportunity for enhancements to blue and green infrastructure and will deliver a Strategic SANG of 40ha which will result in enhancement of the landscape. These measures are secured in Policy SA20.
- 2.3 A full suite of ecological site investigation has taken place (Doc ID 7.), this identifies those habitats which are present on Site and should be protected. The Concept Masterplan (Doc ID SA20.1) shows how the development parcels will be delivered with green corridors and opportunities for ecological enhancement. The landscaping of the proposed SANG will also significantly enhance biodiversity across the Site. These measures are required in Policy SA20 and would seek to conserve and enhance opportunities for wildlife and biodiversity net gain.
- 2.4 The Site adjoins Ancient Woodland, again, this is referred to in Policy SA20. This is justified and will ensure the appropriate buffers are applied to safeguard the future protection of the Ancient Woodland. These can be

successfully achieved and are shown on the Concept Masterplan (Doc ID SA20.1).

- 2.5 There is a small area of historic inert landfill to the east of Imberhorne Farm Cottages; this referred to in Policy SA20 and is considered necessary to ensure the future investigation of this area and any necessary remediation.
- 2.6 There are no heritage assets located within the boundaries of the land allocated at Policy SA20, however, there are listed buildings adjoining the Site as follows:
- Imberhorne Farmhouse (grade II)
 - 1 – 3 Imberhorne Farm Cottages (grade II*)
 - Gullede Farmhouse (grade II*)
- 2.7 A Heritage Statement has been prepared by Orion Heritage, on behalf of Welbeck Strategic and in support of the allocation (Doc ID SA20.5). The significant of all heritage assets were assessed, including the archaeological, artistic, architectural and historic values, it was found that these values were not harmed by the proposals and allocation of the Site. The importance of these buildings is noted in Policy SA20, requiring that they are fully considered in the masterplanning of a future planning application.
- 2.8 A further technical note is at Appendix A and demonstrates how specialist heritage inputs and consultation with the Council's Heritage Officer and Historic England has influenced the evolution of the concept masterplan and the site allocation boundary.
- 2.9 It is considered that Policy SA20 represents a detailed policy for the delivery of housing and mixed use development which will ensure the protection of the environment, landscape, biodiversity and heritage assets. It provides a thorough understanding of the constraints and opportunities of the Site and the development proposals and is therefore justified and in accordance with national policy.

Given the importance of Areas of Outstanding Natural Beauty (AONB) as a national policy constraint with the highest status of protection in the English town and country planning system in relation to landscape and scenic beauty, what is the justification for allocating the proposed number of dwellings in the High Weald AONB? In relation to paragraph 172 of the Framework and the support in policy DP16 for appropriate 'small scale'

proposals in the AONB, what should be the definition of 'major development' in the context of Mid Sussex?

2.10 No comment.

Is policy SA38, in relation to air quality, justified and effective? Is it based on the latest air quality modelling data? For example, should the work on air quality impacts include the consideration of particulates? In particular, are the proposed mitigation measures sufficiently effective to, in all likelihood, prevent adverse effects from proposed development on the Ashdown Forest SPA and SAC?

2.11 No comment.

Do any of the proposed site allocations threaten to harm the setting of the South Downs National Park (SDNP), and if so, can effective mitigation be achieved?

2.12 No comment.

The provision of a Suitable Alternative Natural Greenspace (SANG) is set out in District Plan policy DP17, to reduce the likelihood of visitor pressure on Ashdown Forest. Is it the role of this Plan to specify on a map the geographical extent of the 33 ha SANG at East Court and Ashplats Wood in East Grinstead? Is there a target date for implementation, and are there convenient public access arrangements?

2.13 Policy SA20 secures the delivery of a Strategic SANG of c40ha (the Concept Masterplan – Doc ID SA20.1 - currently shows approximately 42ha). As set out in the Council's HRA (Doc ID HRA1), this is required to mitigate the potential impacts arising from greater recreational pressure through the SA DPD and future residential development, as the East Court / Ashplats Wood SANG is nearing its capacity.

2.14 The extent of the proposed Strategic SANG is noted on the draft Policies Map and in Policy SA20.

2.15 It is considered that the SANG would be implemented in the initial phases of development (of the Site allocated at Policy SA20) and will deliver suitable public access arrangements, which would be secured through a forthcoming planning application.

Appendix A

Orion Heritage

Citibase, 95 Ditchling Road, Brighton, BN1 4ST
+44 1273 573 803

Landmark, 3 Hardman Square
Spinningfields, Manchester, M3 3EB
+44 161 457 0291

County House, St Mary's Street, Worcester, WR1 1HB
+44 1905 697 990

www.orionheritage.co.uk



7th May 2021

IMBERHORNE FARM, EAST GRINSTEAD – MASTERPLAN DEVELOPMENT SUMMARY IN RESPECT OF HERITAGE ISSUES

This note serves to outline the iterations of the development masterplan for proposals at Imberhorne Farm, allocated at Policy SA20 of the Site Allocations DPD in response to heritage constraints, and to demonstrate how the finalised masterplan serves to minimise harm in terms of affected heritage assets.

Barton Wilmore's Drawing 25626-9306 Revision A - Strategic SANG Plan for the site from November 2019 depicts residential development to the land east and west of the Grade II listed Imberhorne Farm and Grade II* listed Imberhorne cottages, with the latter parcel of development serving to impact on the views available between the Farm and Cottage group and the Grade II* Gullege, located further west.

The Concept Masterplan from December 2019 25626-9305 D-A2 (Barton Wilmore) illustrates the landscaping of the SANG and also the inclusion of additional land to the north within the blue line boundary, but otherwise remains identical in terms of development parcel layout and content to the previous iteration.

Discussions with Mid-Sussex District Council and Historic England in the early part of 2020 highlighted the importance of retaining the historic intervisibility between the assets in terms of the contribution to their significance, and in consequence the southern development parcel between the assets was removed from the red-line boundary of the development. It now lies within the blue line of additional land retained in agricultural use to preserve the nature and character of the views and the historic functional association of this land parcel (February 2020 Concept Masterplan Drawing 25626-9305 G : Examination Document Ref. SA20.1).

To the north of Imberhorne Farm and Imberhorne Cottages, the location of the school was altered further to the east so that the associated playing fields would more closely represent the historic open character of the field parcel than the previously proposed residential care development. The residential care element of the development proposals has been moved to the land parcel to the south-east of Imberhorne farm, with the heights of the buildings subject to restriction. These alterations to the concept masterplan serve to minimise the experience of residential build up in the vicinity of the assets, and retain a sense of openness respectful of their historic origin and function.

As a consequence of retaining the intervisibility across the field parcel between the assets, the development proposed for this area is relocated to land east of the proposed SANG, and to the north-east of Gullege. In terms of the experience of the asset and the contribution made by its setting, the key views associated are those obtained from the south-east of the asset across the field parcel now removed from the red-line



boundary. From the north the asset is screened from the pathway and land parcels to the north by tree-planting to its garden plot.

The Concept Masterplan depicts a one hectare set back to the development envelope of the most proximate field parcel to the asset, with the area of set back maintained as open green space with tree planting. This serves to filter the experience of development from the environs of the asset and will maintain the secluded and enclosed character of the northern aspect of the asset's plot which, as evidenced in the Heritage Statement historic map regression (Orion 2020) (Examination Document Ref. SA20.5), is depicted as tree planted from at least as early as the tithe mapping.