

Mid Sussex Site Allocations DPD Inquiry Statement

SA23 Land at Hanlye Lane, Cuckfield



**Matter 3.3 Hearing Statement on behalf of
Cuckfield Parish Council (Respondent 726)**

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Introduction

Cuckfield Parish Council strongly object to Policy SA23 which allocates Land at Hamlye Lane for 55 dwellings as it is not justified. The site allocation Land at Hanlye Lane East of Ardingly Road is not suitable for development of 55 dwellings as set out below.

Landscape

Para 169 of the NPPF states that planning policies should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services and of trees and woodland.

The Site Selection Paper 3 Appendix B - Housing site proformas accepts that this site (479) has substantial landscape sensitivity.

Evidence prepared for the Cuckfield Neighbourhood Plan shows that the site is identified as part of an area of substantial landscape sensitivity and moderate landscape value¹ (Cuckfield Landscape Character Assessment, Hankinson Duckett Associates, 2012).

The substantial landscape sensitivity is based on an assessment of a number of factors such as

- inherent landscape qualities (intactness and condition);
- the contribution the area has to the setting of the settlement;
- the contribution the area has to the rurality of the surrounding landscape.

The site also abuts the designated AONB to the north. The area is identified in the Landscape Assessment as having low capacity.

The Assessment states:

Character Areas which have a Negligible to Low/Medium capacity rating indicate that development would have a significant and detrimental effect on the character of the landscape. Any development in these character areas should only be on a very small scale and proposals would need to demonstrate no adverse impacts on the setting to the settlement or the wider landscape.

Policy CNP5 of the made Neighbourhood Plan states that a proposal for development will only be permitted where it would not have a detrimental impact on, and would enhance,

¹ Within the Cuckfield Landscape Character Assessment, 2012, the site lies within Area 11: Whiteman's Green Eastern Slopes

2.5.2 The landscape sensitivity of each character area is evaluated, taking into account both landscape and visual factors, including the following as appropriate:

- Inherent landscape qualities (intactness and condition)
- Indications of time depth, such as historic character, period and boundary loss, derived from the Historic Landscape Characterisation study
- The contribution the area has to the setting of the settlement
- Consistency with existing settlement form/pattern
- Contribution the area has to the rurality of the surrounding landscape
- Coalescence between settlements

areas identified in the Cuckfield Landscape Character Assessment as having substantial landscape sensitivity.

Impact on Landscape of the Policy SA23 Housing Allocation for 55 dwellings

The site is abutted by open countryside to the north and south. To the east lies a largely linear development abutting Ardingly Road with deep back gardens and to the west a cluster of rather sporadic development at the former Court Meadow School and Horsgate House, Hamlye Lane.

To the south, a new small scale residential development of 14 dwellings is located such that short and long public views from Ardingly Road identified within the Neighbourhood Plan are retained together with the provision of additional amenity space for the village.

In contrast to the west of Ardingly Road, the influence of built form to the east of the road and south of Hamlye Lane is therefore very limited. It is difficult to understand how the apparently contradictory statements in the site promoter's Landscape Statement that the site is well-enclosed by hedges and trees, but is strongly influenced by settlement and existing dwellings (Para 5.26) can both be true. As the Inspector will observe, the site has a rural character which forms part of the setting of, and entrance to, this part of the village.

The District Council's adopted Mid Sussex Design Guide states:

Principle DG18: Create a positive development edge:

Development should be sensitively designed so that it avoids imposing upon the rural edge and existing roads that are characterised by their hedgerows and tree belt. This may require additional boundary planting. At the rural edge lower density development will normally be necessary.

The Landscape Considerations section of the policy contains a significant number of landscape constraints and requirements which must be satisfied. This includes the need to retain both short and long views from Hamlye Road (see separate section below).

The site promoter's Arboricultural Survey (Paras 5.2 – 5.11) accepts that the appraised Masterplan would result in:

- removal of part of the central hedgerow (H1)
- removal of five groups of trees (G5, G6, G10, G13 and G16)
- the incursion of two dwellings into root protection areas (RPA's) of two TPO trees with impacts likely to affect the health of the trees
- hard surfacing/ driveways within RPAs of four TPO trees
- footpaths within RPA's of 12 trees (six with TPOs)

This demonstrates that even a revised Masterplan (Rev A) designed to show the feasibility of development of 55 units in a favourable light would have unacceptable consequences on the landscape features of the site which the policy seeks to protect.

The total site area of 5.75 hectares is reduced to a net developable area of 1.65 hectares on the illustrated Masterplan submitted. The Masterplan Revision A provided by the site promoter demonstrates clearly that a capacity of 55 dwellings at a net density of 33dph is inappropriate for this site and simply cannot be realistically achieved.

The net density of 33dph is typical of a suburban development. Masterplan Revision A has all the appearance of a modern cul de sac development of uniformly sized, closely-spaced dwellings resulting in a cramped, overdeveloped appearance with poor reference to the rural character at this edge of Cuckfield. There is inadequate space for significant planting between roads, buildings, visibility splays, driveways, footpaths and the turning heads, As illustrated front gardens are almost non-existent and rear gardens are small.

Providing a green shield around a site which results in a cramped and suburban layout would not in itself meet the landscape requirements of the DPD or the adopted Design Guide. Within the northern part of the site allocated for housing development there must be space for development to avoid the trees (including those protected by TPO's) and hedgerows and their RPA's, allow view corridors from Hanlye Road including through the site towards the South Downs National Park, provide sufficient landscaping within the site and to allow a lower density to ensure a successful transition of development into open countryside.

In bringing forward the Submission Site Allocations DPD, the District Council omitted the requirement in the Regulation 18 *to concentrate higher density development towards the northern part of the site*. Illogically, this was not accompanied by a reduction in the dwelling capacity of the site.

In accordance with the Site Allocations DPD Policy SA GEN: General Principles for Site Allocations (Landscape considerations), a landscape led approach should utilise an appropriate site layout and density which complements and contributes to the overall character and appearance of the area. The revised Masterplan provided by the promoter serves to demonstrate that a requirement of 55 dwellings cannot be satisfactorily achieved on this site.

Principal Views

One of the distinctive features of Cuckfield village is the visual connectivity with the surrounding countryside from public places. These distinctive views combine shorter uncluttered views of the more immediate setting of the village with views across the Low Weald to the South Downs National Park to the south.

The made Cuckfield Neighbourhood Plan identifies the views from Hanlye Lane as some of the principal views in Cuckfield which should be maintained (View 5, Map 5).

The photographs included in Appendix 1 illustrate that short and long views are available from breaks in the hedge along Hanlye Lane even when in full foliage and that development within Cuckfield does not form a noticeable part of the views.

Policy CNP5 states that development should only be permitted where it would maintain the distinctive views of the surrounding countryside from public vantage points within, and adjacent to, the built up area, in particular those defined on Map 5.

Impact on Identified Views of the Policy SA23 Housing Allocation for 55 dwellings

Masterplan Revision A proposed by the promoter of the site shows an almost continuous line of development which would block short and long views of the site from Hamlye Lane, This

would be contrary to the Cuckfield Neighbourhood Plan (Policy CNP5) and the Mid Sussex Design Guide which states:

3.1.10 Views across the open countryside from elevated locations in the District...are an important part of the character of the District and must be retained.

3.1.11 New development, particularly at a larger scale, can have a significant impact on these views and the open character and must be carefully managed to minimise adverse impacts.

Principle DG10: Respond to topography and strategic views

Applicants should identify important views into and out of their site. This may include long distance views to landscape features or buildings or shorter distance views to attractive or distinctive townscape. Where appropriate development should be laid out so that these views are retained and where possible enhanced to improve legibility whilst ensuring that new development is appropriately screened so as not to impact on views towards the site.

In this case, following extensive research and local community engagement, the Neighbourhood Plan has already identified the important views available south from Hamlye Lane. The construction of 55 dwellings on this site would not maintain identified distinctive views.

Biodiversity

The Biodiversity and Green Infrastructure section of Policy already includes a number of requirements to conserve and enhance areas of wildlife value to ensure there is a net gain to biodiversity overall.

The Ecological Assessment Undertaken on behalf of the site promoter identifies all of the site as semi-improved grassland? However, SA23 Biodiversity and Green Infrastructure states that only the land to the south is designated as a Semi-Improved Grassland Priority Habitat which should be managed and restored in accordance with Natural England management objectives. It is unclear why only part of this site merits protection and enhancement.

The Ecological Assessment confirms that the hedgerows and trees within the site are of relatively greater value in the context of the site due to opportunities offered to fauna groups such as foraging/ commuting bats, nesting and foraging birds and, potentially, dormice.

Impact on Biodiversity of the Policy SA23 Housing Allocation for 55 dwellings

Evidence from the arboriculturalist indicates the construction of 55 dwellings as shown on the Masterplan would result in the loss of trees and hedgerows. However, in order to achieve a net gain to biodiversity overall, sufficient provision must be made for the protection and enhancement of wildlife networks (including hedgerows) throughout the site.

Social and Community

The Parish Council supports the creation of a well connected area of open space on the southern field, suitable for informal and formal recreation, which enhances and sensitively integrates the existing rights of way.

The adopted Mid Sussex Design Guide Principle DG25: Enhance the environment and sense of place through open spaces, states:

Applicants should also consider the future maintenance of open spaces when designing proposals and provision should be made for the ongoing cost of this maintenance.

SA23 contains no provision for the future maintenance of the semi-natural improved grassland.

Changes required to Policy SA23 of the Regulation 19 Site Allocations DPD

The Parish Council seeks the deletion of Policy SA23 Land at Hanlye Lane, East of Ardingly Road, Cuckfield.

If the Inspector is minded to retain the site within the Site Allocations DPD, further Modifications should be added as follows:

Urban Design Principles:

The Parish Council has experience of adopting local green space which is brought forward through development proposals. In order to secure the long term future and management of the southern field, add to the following:

As shown on the policy map, no development is to be provided on the southern field, south of the row of trees protected by Tree Preservation Orders, which is unsuitable for development as it is more exposed to views from the south, contributes to settlement separation and is crossed by rights of way providing scenic views towards the South Downs. **‘The southern field should be provided as public open space and transferred to the Parish Council with sufficient financial provision to enable future maintenance’.**

Similarly, the Delivery Mechanism should be amended to:
Landowner, Developer and **‘Parish Council’**

Landscape Considerations:

The sensitive location requires a landscape-led scheme of low density. In order to achieve the landscape requirements of the policy, the capacity of this site should be amended.

A Masterplan should identify and protect view corridors through the site to the wider countryside (including the South Downs National Park). The view corridors should themselves retain a rural character and not rely on a new road or footpath fronted by closely spaced dwellings, parked cars, lighting, etc.

Add to the following:

Within the northern field

- **Landscape should dominate the built form.**
- **Low density development should be well screened by vegetation**
- **Additional trees should be provided between and behind buildings forming the backdrop and setting for development and a skyline feature.**
- **Development should be served by narrow and hedge lined access drives.**

Number of Units should be amended to 20 - 30 dwellings.

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Appendix 1

Views south from Hanlye Lane through the hedgerow, across open fields, towards a sweep of the South Downs, May 2021



