

SUMMER 2016

Director's update



Kia with her son Oliver in the low Weald

I have thoroughly enjoyed my first six months at CPRE Sussex and have been very impressed with the commitment, knowledge and talent shown by the volunteers and action groups I have met across the two counties. This newsletter summarises our recent activity. There are some common themes across Sussex, including:

- Local Planning Authorities (LPAs) under pressure to adopt Local Plans with high 'Objectively Assessed Housing Need' (or Subjectively Guessed Housing Demand) figures before 2017, allocating increasingly large sections of countryside for development
- LPAs without an up-to-date Local Plan or unable to demonstrate a deliverable five-year supply of land, facing increasing speculative development.

As a nation, we are on the verge of the 'biggest house-building programme since the 1970s' (G Osborne, Autumn spending review 2015). Therefore this is the greatest call to arms for CPRE members to ensure we get the right homes in the right places. CPRE Sussex will be calling for:

- Well-designed, affordable, appropriately located housing, which reflects the unique and special characteristics of our counties
- Our Areas of Outstanding Natural Beauty to be given equal planning protection to that of the National Park
- The value of nature to be at the heart of decision making
- Recognition of the value of undesignated countryside in terms of scenic beauty, biodiversity and tranquillity
- Infrastructure that meets the needs of local people and does not damage the countryside
- A halt to airport expansion
- Democratic planning decisions which take into account the wishes and needs of local people, for example through Neighbourhood Plans.

We are planning to celebrate our 90th birthday with a party at Hever Castle in September. We'll be letting you know more soon and hope you'll join us.

We will continue to be in the vanguard, protecting and shaping the future of Sussex. Celebrating all that makes our countryside unique and beautiful. A truly special place.

Kia Trainor (kia.trainor@cpresussex.org.uk)

District Planning News

Our District Groups co-ordinate our response to planning issues – a lead from each group attends regular meetings of the Protect Sussex Group to share information and identify common themes. Following is a brief update from each District.



Arun

There is a lot of development going on and being planned in the District and we would like to be able to do much more to protect the Arun countryside.

We are looking for more people to get involved in a local group in Arun, so please let us know if you have the passion and time to help by calling the CPRE Sussex Office (Tel: 01825 8860256) or emailing lesley.wilson@cpresussex.org.uk.

The Arun Local Plan was submitted to the Inspector on 30 January 2015 but the outcome has not yet been published. The Secretary of State called in an application for 400 homes and associated works at Fontwell due to a conflict with the Neighbourhood Plan.

Martin Beaton
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Adur & Worthing

We are heavily involved in the draft Local Plan for Adur. In March this year, the Council approved the amended allocation of up to 600 homes – plus a 10,000m² business development/school/community centre – and a new roundabout on the Lancing stretch of the A27 on New Monks Farm. This is just south of the A27 and adjoining the Shoreham Airport in the Lancing Strategic Gap. This is one of the draft Local Plan's strategic allocations.

CPRE Sussex has concerns that whatever mitigation methods are put in place, in extreme weather, Lancing will always be vulnerable for flooding from high ground water levels. With their experience every winter of flooding, the local community knows that the plan to build a large development in this extremely fragile flooding containment area needs to be properly assessed. The local authority appears to have failed to listen to their comments or take account of CPRE's expert consultant's report (2014) or the West Sussex County Council drainage study. CPRE is urging Adur District Council to revisit the drainage aspect of this allocation before submission to Government.

Bill Freeman
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Brighton and Hove

The Brighton Group needs new members to help us continue to protect the green space within the city and on the urban fringes, so please get in touch if you would like to join by calling the CPRE Sussex Office (Tel: 01825 8860256) or emailing lesley.wilson@cpresussex.org.uk.

Now the City Plan Part One has been adopted, work will begin on identifying more sites for the required 13,200 new homes. In her report, the Inspector recognised the significant constraints the city faces in finding new land for development. The 'objectively assessed need' for new housing has been increased to 30,120 homes by 2030, but the housing requirement is 13,200 new homes – an average rate of 660 new dwellings per year (this means that Brighton is unable to meet its objectively assessed housing need by a considerable shortfall). The Inspector noted the lack of flexibility in the five-year supply of housing sites and considered this to be a serious weakness.

Currently, the only urban fringe site to be allocated for development is Toad's Hole Valley but more sites will be allocated in part two of the Plan. A key concern

for CPRE Sussex will be the impacts in terms of landscape and ecology of the development.

One recent success in protecting sites on the urban fringe has been the dismissal of an appeal for 85 new market homes on green-field land between Ovingdean, Rottingdean and Woodingdean.

The Brighton and Hove CPRE group worked with other local pressure groups including Save Our Deans. We had concerns about the ecology of the site, the scale of the development and the impact that it would have on the nearby South Downs National Park.

These issues were echoed by planning inspector Peter Rose, whose decision was published in April 2016. He said the 'significant extent' of the development would introduce an 'unduly urbanised form', to the rural area, and the scheme was inappropriate for the area.

Simon Kirby, Conservative MP for Brighton Kemptown, said: "I have always been consistent that any new development in the city should be on brownfield and city centre land rather than green-field sites such as Meadow Vale."

Corinne Attwood
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brightonbeautiful.com



Simon Kirby
with Save our Deans campaigners

Chichester

Recently threats from infrastructure and new building in Chichester District have increased enormously and we are looking for more local people to join us. Please get in touch via the office if you feel you have the passion and time to help and would like to join the group. Tel: 01825 8860256 or email lesley.wilson@cpresussex.org.uk.

The Chichester Local Plan, which excludes the South Downs National Park Plans, was adopted in 2015. It will need to be reviewed by 2020 and will probably increase housing targets, pending decisions on the upgrading of the A27. The current Plan sets a target of 4,740 new homes, which means that over the next 16 years, approximately 435 homes will be built annually. Even with the Local Plan in place, inappropriate, speculative development proposals are coming forwards, which do not conform with the Plan. Two recent appeals have been allowed to go ahead in Earnley (110 homes) and Westbourne (16 homes) despite running contrary to the Local Plan and the wishes of local people – a very worrying precedent.

More than 500 houses have been allocated at Shopwyke Lakes to the east of the A27 and preliminary work is underway. There are two other major sites, Old Place Farm to the east of the City (400 homes) and White House Farm to the north-west (750 homes), and further housing sites have been allocated in Tangmere and the Manhood Peninsula.

Although A27 proposals are still in the air, CPRE Sussex is extremely relieved that the combination of



Bill Freeman, Adur and Worthing



Corinne Attwood, Brighton and Hove

local pressure groups has chalked up a success in seeing off the proposal for a second bypass to the north of Chichester, which has now been dropped as an option by Highways England. Proposals will now focus on grade separation, flyovers and 'hamburger roundabouts' on the existing road. CPRE Sussex will take part in the next round of consultation, due in early summer. Our main concerns are that any proposals do actually lead to a reduction in congestion, both now and in future, taking into account the anticipated rapid increase in development across the district and city. We also want to ensure that the impacts of any improvements on the landscape are well considered and addressed.

Other areas of focus include land use changes made without the consent of the Planning authority at the Dangstein woodland area. Concerned local people



Rodney Chambers, Chichester

are pressuring the council for enforcement action – CPRE Sussex is currently investigating and Sarah Dobson will be offering advice. We are also following activity at St Cuthman's, where The Durand Education Trust is hoping to submit an 'estate plan' for the future of the whole site.

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Alan Smith
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Horsham & Crawley

Horsham District's local plan, (the HDPF 2011-31), was formally adopted by Horsham District Council in November 2015, having been found sound by the examining Inspector, Mr Geoff Salter.

Inspector Salter's approval of the plan was conditional on the Council's acceptance of his imposed target of 800 houses per year and his requirement that the target be reviewed and increased by 2018.

Since the Inspector's authority came directly from the Secretary of State, this was an imposition that Councillors apparently could not refuse. Or perhaps they didn't read his report?

In addition, Mr Salter informed the Council that a decision to expand Gatwick airport by building a second runway would 'necessitate an urgent review of the HDPF' – and a substantial increase to his already excessive interim target. Disturbingly, too, Inspector

Salter was empowered to impose his huge interim target without having to determine whether there would be sufficient funding to pay for the infrastructure and services needed in order for his target to be truly sustainable.

This is not joined-up planning, and adverse consequences are now emerging.

Although Billingshurst is remote from the coast, Inspector Salter considered that it 'may have some potential to relieve some of the pressure for new housing in some coastal authorities'. Geographical confusion on his part, or possibly a major rise in sea level is expected?

Meanwhile, developers are using the appeal system to test and challenge the HDPF and Neighbourhood Plans now progressing, where the Council has rightly refused applications to build on green-field sites not allocated for development at Henfield, Storrington, West Chiltington and Warnham.

Dr Roger F Smith
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Lewes District

Lewes District is slowly edging towards being able to adopt a Core Strategy, or Local Plan Part 1. The planning inspector who oversaw the initial January 2015 public examination concluded that to be found sound the District would have to find sites for at least 6,900 new homes. This was 1,000 more than the LPA initially proposed, but at least 3,000 fewer than the 'objectively assessed housing need' for the district. He proposed that most of the difference should be covered by the inclusion of four new green-field strategic sites, in Peacehaven, Newhaven, Lewes and Ringmer.

A second examination was held in December 2015, at which an array of developers argued for a larger total – and additional green-field sites – and claimed that the LPA plan could not demonstrate a five-year housing land supply. However, the inspector has now reported that he is satisfied with the 6,900 total and the strategic sites now included. One of these, on the edge of Lewes, lies within the South Downs National Park. He also accepted that the District could show the necessary housing land supply, despite this being dependent on a contested 5% buffer and the housing backlog accumulated during the recession being spread over the entire plan period. In addition, Lewes District now has two adopted Neighbourhood Plans, two more approaching referendum and several others making serious progress.

The rate of approved planning permissions, mostly for allocated or urban brownfield sites,

increased substantially in 2015. This has yet to be reflected in actual house building, but perhaps that will follow in future years. It does seem clear that here, as elsewhere, it is builders rather than planners who are now restricting housing delivery.

None of this has discouraged the promoters of other unsustainable rural green-field sites, excluded from both District and Neighbourhood Plans. Several such applications have been submitted, and two, when refused, taken to appeal. The promoter of one of these has also taken the Newick Neighbourhood Plan, which omitted their site, to judicial review and, when that was lost, the Court of Appeal. The Secretary of State seems to be calling in such appeals for his own decision.

Dr. John Kay
johnkay56@gmail.com

Mid Sussex

The District Council has again deferred submitting its draft District Plan to the Planning Inspectorate for public examination. Late substantive amendments to its proposals to significantly increase the district's housing target and allocate a 600-home development to a site within the High Weald Area of Outstanding Natural Beauty near Pease Pottage – a site that the Council itself had described last summer as 'very unsuitable' for housing – have proved to be very controversial. We await the submission version of the draft Plan with mixed interest and trepidation.



Dr. John Kay, Lewes

Linden Homes is appealing against the Council's decision to refuse planning permission for 200 new homes on farmland adjacent to the Grade II-listed viaduct carrying the Bluebell railway into East Grinstead. CPRE supported MSDC's decision to refuse permission for the scheme on a number of grounds, including its impact on the local landscape character, agricultural capability and on the town's already severe traffic congestion. We are also concerned as to its potential effect on the listed viaduct and on nearby EU-protected habitats on Ashdown Forest. The appeal is set to be heard in October.

The Lindfield Preservation Society and local Lindfield residents scored a victory at last month's planning committee where they persuaded a clear majority of committee members to reject a recommendation from their planning officers to allow a 180-home development on a green-field site on Scamps Hill between Lindfield and Haywards Heath. This site had been rejected last year as unsuitable for development by both the District



Michael Brown, Mid Sussex

Council for the purposes of its draft District Plan, and the local parish councils of Lindfield and Lindfield Rural in the preparation of their joint neighbourhood plan that was adopted in January.

This gives some comfort to all those across the county who have worked immensely hard to develop neighbourhood plans for their communities and all those who have supported their town and parish councils by voting in referenda to approve them. It offers some reassurance as to their value to local communities. In the case of Mid Sussex, though – where 10 neighbourhood plans have already either been adopted or where adoption is imminent, and most others are well advanced – there is likely to have to be a review of them all once MSDC's new District Plan is adopted to ensure that they conform to that new Plan. Given a likely hike in the district's housing target and the identification of yet more sites to meet that target, local communities will continue to



Stephen Hardy, Rother

come under heavy development pressure. Current adopted neighbourhood plans cannot be regarded as sacrosanct.

All this is the product of foolish Government policy to measure a district's housing target by reference to the number of houses that get built – something over which the Council has no control – rather than by the number of planning permissions granted. If developers sit on their planning permissions without building, as they do, the rules will unfairly penalise the Council, and us residents, by forcing the Council to allocate yet more land – almost inevitably green-field land – to demonstrate that they can meet their target, whilst the developers continue to sit pretty. The LPA's job is surely to ensure land is available. It is then the developers' job to get the houses built. If they decide not to do so, they should be penalised, not the community or the Council.

Michael Brown
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Rother

The good news for planning in Rother is that it has an approved Core Strategy, adopted September 2014. This comes with an acceptance by the Inspector of the importance of the High Weald Area of Outstanding Natural Beauty in safeguarding much of the Rother District, a 5% buffer for five-year housing figures and the ability to use the Liverpool method to recover unmet housing figures.

The bad news is that in a recent (March 2016) decision, an Inspector at appeal on a development for 30 plus houses in Ticehurst agreed with developers that Rother did not have a five-year housing supply, opening the doors to a requirement for a 20% buffer. So, we could be back to the tilted playing field under para 14 of the National Planning Policy Framework, where developers could argue the Core Strategy is already out of date. Latest planning applications in Rother already show they are arguing for planning carte blanche. However, the Inspector in the Ticehurst decision decided to refuse the appeal because of its location within the Area of Outstanding Natural Beauty.

Stephen Hardy
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Wealden

Wealden is now having to abandon its Core Strategy Local Plan (CSLP 2013) because it is now considered out-of-date, having been based on the housing targets of the old South East Plan (2004). A new Objectively Assessed Housing Need (OAN) of 735 homes per annum has been put forward and Wealden District's initial proposal is not only to meet this in full, but also to exceed it because of the 'duty to cooperate' with surrounding areas, like Eastbourne.

The Wealden Issues, Options, Recommendations (IOR) public consultation took place from October – December 2015 for the new Wealden Plan: 2015–37 but the new plan is not expected to be finally approved until late 2018. The new plan is heavily dependent on major infrastructure works like a substantial upgrade or replacement of the A27 between Polegate and Lewes and upgrading

or renewing existing sewage treatment plants scheduled to be completed by 2022.

As development in the northern parts of the district – close to the EU-protected Ashdown Forest – is constrained, no major additional housing is planned for Uckfield or Crowborough. Instead, the plans for 20,000 new homes is to be provided by expanding Hailsham by about 9,000 homes, more than doubling its existing size and its population increasing to around 50,000.

Additionally, significant green-field housing developments for the larger villages are proposed, especially in South Wealden. They are all proposed to increase in size by about 50%. Even Heathfield and the villages within the High Weald Area of Outstanding Natural Beauty are planned to see substantial growth if they are away from the Forest.



David Connoley, Wealden North

Worse still, Wealden Council are now claiming they do not have a five-year land supply for housing, which means commercial developers can target virtually any sustainable green-field site and the protection of development boundaries from the CSLP (2013) is weakened. Inevitably this means that there will be many more speculative planning applications.

David Connoley (Wealden North)
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John Hurwood (Wealden South)
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Dates for your diary

You are invited to our AGM 2016

Saturday 16 July

Barcombe Village Hall,
Barcombe Mills Road, Barcombe, BN8 5BH
The meeting starts at 10:30am (Coffee from 10am)

Please make **Saturday 16th July** a firm date in your diary.

This year we are pleased to invite you to join us at the impressive, sustainable and modern **Barcombe Village Hall**, set in stunning countryside with wide-reaching views towards the Ashdown Forest and across to the Ouse Valley.

Following formal business, we will be delighted to welcome **Professor Dave Goulson** from Sussex University, a world-leading researcher into bumblebee ecology and conservation. He jointly formed the Bumblebee Conservation Trust in 2006 after the decline and extinction of some of our UK species. As well as being a leading scientist he is also an active conservationist helping to spread the message of the plight of our bumblebees. He is the best-selling author of *A Sting in the Tail* and *A Buzz in the Meadow*.

Local genealogist, **Ian Hilder**, will then follow with a 'Guided Tour of Edwardian Barcombe' in postcards. Postcards have a story to tell – by comparing the images on the front of the cards we see how things have changed, or perhaps stayed the same. The back of the cards often have an equally interesting message, along with the postmark showing when and where the card was posted.

To end the meeting, you can relax and enjoy a delicious buffet lunch, following which you may wish to join a guided walk led by **John Harmer** from East Sussex Ramblers.

Please see the enclosed letter for full information and travel advice together with the Booking Form and Agenda.

We look forward to welcoming you.

Professor Dave Goulson was brought up in rural Shropshire, where he developed an early obsession with wildlife. He has a bachelor's degree in biology from Oxford University, and a doctorate on butterfly ecology from Oxford Brookes University.

He lectured in biology for 11 years at the University of Southampton, and began to study bumblebees in earnest. He moved to Stirling University in 2006 then on to Sussex in 2013.

He has published many scientific articles on the ecology and conservation of bumblebees and other insects. He is the author of

Bumblebees; Their Behaviour, Ecology and Conservation, published by Oxford University Press in 2010, and of the bestseller *A Sting in the Tale*, a popular science book about bumblebees in 2013, followed by *A Buzz in the Meadow* in 2014.

Dave founded the Bumblebee Conservation Trust in 2006. He has received a multitude of awards and in 2015 was named number 8 in BBC Wildlife Magazine's list of the top 50 most influential people in conservation.

He lives in East Sussex with his wife and their three boys.

Other dates

Come along with family and friends and visit our stall at these summertime events!

Sat 2nd & Sun 3rd July

Brightling Park
International Horse Trials,
Brightling Park, Robertsbridge,
East Sussex TN32 5HH
www.brightlingpark.com/horse-trials

Sat 24th July, 2pm

Binsted Strawberry Fair, Flint Barn,
Binsted BN18 0LL
www.binsted.org/strawberryfair



Professor Dave Goulson

