

Penny Murray
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30th September 2005

SOUTH DOWNS JOINT COMMITTEE

PLANNING COMMITTEE

A meeting of the Planning Committee will be held at **10.30 a.m.** on **MONDAY, 10TH OCTOBER, 2005** at **THE VICTORIAN BARN, VICTORIAN BUSINESS CENTRE, FORD LANE, FORD, NR. ARUNDEL, WEST SUSSEX**

Mike Kendall

Clerk to the Joint Committee

A G E N D A

1. **Apologies**

2. **Declarations of Interests**

Members and officers are invited to make any declarations of personal or prejudicial interests that they may have in relation to items on the agenda and are reminded to make any declaration at any stage during the meeting if it then becomes apparent that this may be required when a particular item or issue is considered.

3. **Minutes** of the meeting of the Committee held on 12th September, 2005 (page 3).

4. **Urgent Matters**

As the item "Any Other Business" does not appear on the agenda, members are asked to raise any urgent matters at this stage and not at the end of the meeting. The Chairman will decide whether the Committee should discuss any items so raised.

5. **Planning Manager Update**

To receive an oral update on planning matters of interest to the Committee.

6. **East Hampshire Local Plan (Second Review) - Proposed Modifications**

To consider a report by the South Downs Officer on the changes to the Plan proposed by the District Council which are of relevance to the Joint Committee and on which Officer comments have been submitted (page 9).

7. **District Level Housing Distribution - Consultation**

To consider a report by the South Downs Officer on the implications for the South Downs of the Government's proposed housing figures contained in the draft South East Plan on which local authorities are seeking comments from the Joint Committee (page 19).

8. **Proposed Changes to Regional Planning Guidance for the South East (RPG9) - Waste and Minerals**

To consider a report by the South Downs Officer on Proposed Changes to RPG9 on waste and minerals and agree comments to be submitted to the Government Office of the South East (page 28).

9. **Chichester District Local Development Framework - Core Strategy - Issues and Options** -Report to follow

10. **Lewes District Local Development Framework - Core Strategy Issues and Options** - Report to follow

DEVELOPMENT CONTROL APPLICATIONS

East Sussex County Council and Brighton & Hove City Council

11. **Application Nos: LW/453/CM and BH2005/05602 - Proposed wastewater treatment works at Peacehaven** - Report to follow

Wealden District

12. **Application No. WD/05/2366/F - Archaeological reconstruction at the existing Sheep Centre, Seven Sisters Country Park, Gilberts Drive, East Dean**

To consider a report by the South Downs Officer on the above application (page 42).

13. **A26 Trunk Road (Itford Farm Bridleway Bridge) Side Roads Order**

To consider a report by the South Downs Officer on the Highways Agency proposal to provide a bridge over the A26 for a safer crossing of the South Downs Way at Itford Farm (page 51).

TO ALL MEMBERS OF THE PLANNING COMMITTEE

Agenda Item No. 3

SOUTH DOWNS JOINT COMMITTEE

PLANNING COMMITTEE

12th September, 2005 - At a meeting of the Committee held at the Victorian Barn, Victorian Business Centre, Ford Lane, Ford

Present: Mr. Millmore (Chairman)

Dr. Bines	Mrs. Palmer	Mr. Weekes
Mrs. Holyome	Mrs. Sutton	Mr. Worsley
Mr. Large		

APOLOGIES

Apologies for absence were received from Mrs. Cartwright, Mr. Fitch, Mr. Shing and Mr. Stevens

DECLARATIONS OF INTEREST

51. Mrs. Sutton declared a personal interest in agenda item 9 (application 05/01801/FUL (W19215/02 - development at West Meon, Hampshire) as a member of the Development Control Committee, Winchester City Council.

Mrs. Holyome declared a personal interest in agenda item 7 (application no. FH/05/03123/FUL - development at Surney Farm, Fernhurst) as she had undertaken secretarial work for a farmer who supplies the applicant.

MINUTES

52. Resolved - That the minutes of the meeting held on 15th August, 2005 be approved as a correct record and that they be signed by the Chairman.

PLANNING MANAGER UPDATE

53. The Planning Manager reported on two matters considered at the meeting on 15th August, 2005:

application no SE/05/02847/FUL - rural exception housing development at Singleton, near Chichester - not yet determined;

application to divert/extinguish public rights of way at Pitshill Estate, Tillington - West Sussex County Council will be considering a report at Rights of Way Committee meeting on 19th September which recommends the Committee to note that the County Secretary intends to lodge an objection to the making of Orders by

Chichester District Council to divert and extinguish rights of way on the Pitshill Estate.

54. The Planning Manager also advised that the Conference scheduled for 30th November, 2005 had been postponed.

DEVELOPMENT CONTROL APPLICATIONS

Brighton & Hove City

Application /no. BH/2005/05037 - Change of use from storage and drinking establishment to disabled childrens holiday centre (use class C2) and nursery (use D1) at the Stable Block, Stanmer House, Stanmer Park, Brighton

55. The Committee supported the aims of the proposal to provide a holiday centre for children. However, Members considered the proposed alterations to the stable block unacceptable for a Grade II* listed building and referred to the City Council's obligations under the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990. It was agreed that the views of the Conservation Officer and English Heritage on the proposals would be important (it had not been possible to ascertain these views prior to the meeting). There was also concern about the traffic implications of the proposed development, no details of which had been provided with the application.

56. Resolved - That Brighton & Hove City Council be advised that

1. The principle of the use is considered acceptable, but cannot be supported until further details regarding the levels of use and the amount of traffic generated have been supplied.
2. The Joint Committee considers the alterations to the historic structure to be excessively damaging. Whilst the views of the Conservation Officer and English Heritage will be important, the Joint Committee considers the proposal to be unacceptable in its current form. It therefore objects to the proposal as submitted.
3. If, notwithstanding this objection, permission was to be granted, the Joint Committee considers that this should be subject to limits on the maximum numbers that use the site, and that the work be carried out to the satisfaction of the Conservation section, including making any alterations reversible wherever possible.

Chichester District

Application No. FH/05/03123/FUL - Conversion of former office/warehouse premises into 17 no. apartments together with associated parking. Demolition of steel framed existing warehouse buildings and removal of hardstanding and car parking areas. Reinstatement of the land with soft landscaping at Surney Farm, Surney Hatch Lane, Fernhurst

57. The Committee considered that the proposed development in this rural location should be significantly reduced in order to be sustainable. The conversion of the two smaller buildings for residential use was supported and it was considered preferable for the other buildings on the site to be demolished and the land restored appropriately for an AONB.

58. Resolved -That Chichester District Council be advised that:

1. The Joint Committee considers the location of the buildings to be too remote for new residential units on this scale.
2. The building itself is considered inappropriate for residential conversion and if it is to be retained then a continued business use would be preferable.
3. The Joint Committee therefore strongly objects to the proposals as submitted.
4. If, however, the District Council considers the principle of residential conversion in this location acceptable, then the Joint Committee requests amendments to the design to remove obtrusive elements. The Joint Committee would be prepared to accept the conversion of the two older buildings to dwellings, provided that the 1930s building and the larger more recent building are demolished or dismantled and removed from the site and the site appropriately landscaped for its AONB setting.
5. If the District Council is minded to approve the application as submitted or as amended,, the Joint Committee would wish to see conditions attached to the permission, if granted, removing permitted development rights for extensions or alterations; requiring all existing and new services to the buildings to be placed underground; and requiring provision to be made within the buildings or elsewhere on the property for the continued or future inhabitation by bats or owls.

Lewes District

Application no. LW/05/1586 - Application for the demolition of barns and construction of five residential units (3 no bed units, 1 no three bed unit and 1 no two bed single storey unit) and five car ports at Spring Barn Farm, Kingston Road, Lewes

59. The Committee noted that the site lay within the settlement boundary area and that, therefore, the principle of development had been established. It was also noted that the design element had been improved, following an objection to the design of the barn building in a previous application for this site. Comment was made about the need for appropriate landscaping of the site and retention of timber slats on the windows of the main buildings.

60. The Committee considered that the footpath adjoining the development should be retained and supported both a proposal that a link be provided between the footpath and Juggs Road and the extension of the cycleway to provide a link between Kingston and Lewes.

61. Resolved - That Lewes District Council be advised that:

1. The former Conservation Board having objected to the previous application, the Joint Committee welcomes the amendments that have been made to the scheme.
2. The Joint Committee now considers the proposals to be acceptable and raises no objection to the application provided that the permission, if granted, is subject to conditions:
 - regarding the materials used (which should be of good quality, and preferably locally sourced);
 - regarding landscaping to prevent gradual change to domestic appearance; retention of existing hedgerows where possible and
 - removing permitted development rights for extensions and alterations to the buildings (the Joint Committee would wish to ensure that the timber slats across the glazed elements are retained).
3. The Joint Committee would also wish to see any existing or new services to the buildings placed underground.
4. With regard to boundary treatment and hard and soft landscaping, hedges should be used where possible, if not, flint and brick or post and rail should be used rather than closeboarded fencing.
5. The Joint Committee would also welcome provision for owls or bats within the roofspace of the "barn".

6. The Joint Committee is also concerned that Lewes footpath 2 adjoining the site should be retained and remain unimpeded during and after the works. The Joint Committee would also welcome the provision of access between Lewes footpath 2 and Juggs Road to the north and the completion of the cycleway along the C7 between Kingston and Lewes.

Winchester City

Application no. 05/01801/FUL (W19215/02) - Erection of 40 no. one, 4 no. two and 2 no. three bedroom dwellings; alteration to existing access; open space; foul treatment plant; new field access; parking area for new development and nos. 1-6 Railway Cottages, Station Road and increase garden area to no. 6 Railway Cottages, Station Road, West Meon, Hampshire

62. The Committee accepted that there was a need for affordable housing in the village and commended the design element of the proposals. However, members considered that the proposed development was not in a sustainable location and there was insufficient information provided with the application with regard to the availability of sites which were closer to the village settlement boundary with better access to transport and shopping facilities. There were safety concerns about the traffic on Station Road, a country lane from the site which residents would need to use to access facilities in the village. There was also concern about the impact of the development on the AONB landscape.

63. Resolved - That Winchester City Council be advised that:

1. The Joint Committee accepts the principle of affordable housing where a need has been identified and in appropriate locations.
2. The former East Hampshire AONB JAC having objected to the previous application on grounds of design and principle of developing the site, the Joint Committee welcome the amendments that have been made to the design of the scheme
3. However, the Joint Committee is concerned about the impact of the development on the landscape and considers the site to be in an unsustainable location. A more appropriate site might be available in a location within or adjacent to the main settlement. The Committee considers that insufficient information has been submitted on alternative sites.
4. The Joint Committee therefore objects to the proposals in this location and would expect the City Council to thoroughly inspect the opportunities for appropriate alternative sites (irrespective of whether they have been identified by the developer) before committing itself to allowing development on this land.

5. If permission were to be granted, this should be subject to the amendments suggested by the Landscape Officer. Additionally, the hedges around the site should be retained in perpetuity. The materials used should match those of the existing terrace, and the addition of chimneys to the roof of the flats would result in a more uniform appearance. Finally, the surfacing of the proposed parking areas should be appropriate for a site in a rural location within the AONB. Hard paved surfaces should be kept to a minimum.

Chairman

PLANNING COMMITTEE

10 OCTOBER 2005

EAST HAMPSHIRE LOCAL PLAN (SECOND REVIEW) – PROPOSED MODIFICATIONS

REPORT BY THE SOUTH DOWNS OFFICER

1. Introduction

- 1.1 Under the new planning system, Local Plans are being replaced by Local Development Frameworks. Existing Local Plans can be 'saved' for a period of three years from September 2004. Those Authorities that were at an advanced stage of a Local Plan Review have been allowed to continue the process, and the finished plan can be 'saved' for a period of three years from adoption. One of those Local Authorities was East Hampshire District Council.
- 1.2 In January 2002 East Hampshire District Council published the Second Deposit Draft of the East Hampshire District Local Plan for public comment. This was discussed by the Planning Panel of the former East Hants AONB JAC. Members agreed to support or object to a number of changes and a response was sent in March 2002.
- 1.3 In April 2003 a Local Plan Inquiry was held in order to allow an inspector to consider objections to the Second Deposit Local Plan, although all unresolved objections to the First Deposit were also considered. The inspector also considered Proposed Pre-Inquiry Changes and Further Proposed Changes. The Local Plan Inquiry formally closed in May 2004.
- 1.4 East Hampshire District Council has now published the Inspector's Recommendations and Proposed Modifications to the Local Plan. Due to the timescale involved, comments have already been submitted on behalf of the Joint Committee.
- 1.5 The purpose of this report is therefore to advise the Committee of the changes proposed by the District Council to the Plan that are of relevance to the Joint Committee and AONB, and to outline the responses that have been made. (Comments could only be made on proposed modifications or where the District Council proposes not to accept a recommendation of the Inspector). As the submitted comments were made at Officer level, additional comments made by the Committee will be passed on to the District Council if required.

2. Relevant Proposed Modifications

- 2.1 **MOD PB4 Planning Context (National Park).** The Inspector recommended re-writing the text relating to the status of the proposed National Park and how planning policies for the AONB would be applied to it. Of particular interest was the insertion of text stating that permission should not be granted for any development that would prejudice the proposed National Park and its purposes.

The Local Authority have accepted the Inspector's proposed modifications, with the only alterations to his text taking place where the past tense was needed. **Support.**

- 2.2 **MOD GS1 Introducing East Hampshire.** The text previously stated that 40% of the District lies within the AONB. This proposed modification adds a further sentence explaining that up to 60% of the District could lie within the Proposed National Park. **Support.**
- 2.3 **MOD GS11 Location of development.** Although no changes have been proposed for this paragraph by the Inspector, the Local Authority have proposed additional text in order to reflect changes made elsewhere by the Inspector. This additional text would include a recognition that although Petersfield may seem a good candidate to make a significant contribution to the District's housing needs, development at the edge of town would intrude into the AONB. **Support.**
- 2.4 **MOD GS12 Policy GS3 Protecting the countryside.** The Inspector recommended that the text of this policy be made more exacting and that the policy be negatively worded in order to place more emphasis on the protection of the countryside. **Support.**
- 2.5 **Various proposed modifications between MOD GS24 and MOD GS49 Settlement boundaries.** Various minor modifications propose the removal of small amounts of land from settlement boundaries, often where back gardens extend into the countryside or where open spaces unsuitable for infill development should be excluded. Some of these settlements are in the AONB or proposed National Park, and a more logical development boundary for these settlements should be supported. **Support.**
- 2.6 **MOD CH3 Policy C2 AONB.** Modifications have been proposed to the policy and associated text to reflect PPS 7. However, the Inspector has also suggested the removal of reference to land along the A3 corridor as it should not be given more protection than the AONB. Whilst it is agreed that protection should be equal across the whole AONB, the removal of references to the land along the A3 is a pity as it is at higher risk than other locations within the AONB. **Support most amendments, but object to removal of reference to A3 corridor.**
- 2.7 **MOD CH30 & MOD CH32 Policy C12 (B) Local Gap.** These two modifications add more land to Local Gaps close to the AONB/proposed National Park. **Support.**
- 2.8 **MOD CH37 Equestrian uses.** It is proposed that the following text be added to the supporting text for the Policy relating to equestrian uses: "*It follows that the cumulative impact of equestrian uses within a locality could, potentially, compound the harm to the countryside that may result from the use*". The recognition of cumulative impact of such developments is very important. **Support.**
- 2.9 **MOD TEP8 New recreational footpaths.** Additional text protects routes of disused railway tracks from development that would compromise their possible use for transport/leisure purposes. **Support.**

- 2.10 **MOD TEP23 & MOD TEP24 Policy E2 Renewable Energy.** The text of the Policy would be strengthened with regard to renewable energy development in the AONB (although the supporting text would state that the policy is capable of being outweighed by material considerations). The supporting text would also be amended to require the removal of wind turbines and restoration of the site if the turbines become redundant or stop generating electricity for a period of 12 months or more. **Support.**
- 2.11 **MOD TEP30 & MOD TEP31 Policy P5 Light Pollution.** The inspector has proposed additional text to the policy and supporting paragraph to acknowledge the potential for light pollution to affect the appreciation of the night sky and the detrimental effect that it can have on wildlife. **Support.**
- 2.12 **MOD HLS17 et al. Reserve housing allocations.** The East Hampshire Planning Panel was consulted separately on the Inspector's proposed changes to Reserve Housing sites. The Inspector recognised the importance of the AONB, and re-ordered the ranking for each site to place those in the AONB at the bottom. Additional sites were also suggested, including land around Petersfield, and comments were submitted to the Local Authority following discussion by the Panel. Additional text is proposed for the supporting text to reflect the importance given to the character of the AONB by the Inspector. **Support.**
- 2.13 **MOD HS7 SCU Leydene.** The Inspector has proposed additional text stating that possible acceptable uses for this isolated site north-west of Clanfield are institutional, storage and other employment uses. Whilst this would be preferable to housing (and any development must generate only a limited amount of traffic), the former JAC has previously stated that the former MOD land should be returned to downland. If an objection is made to this text, then it can strengthen the Joint Committee's case in any future objection to proposals for development of the site. **Object (whilst recognising that limited traffic employment uses may be preferable to other forms of development on the site).**
- 2.14 **MOD HS29, MOD HS30 & MOD HS31 Baseline allocations.** The Inspector has removed some sites from baseline housing allocations in the AONB around Liss as he felt that they were unsuitable for growth. **Support.**
- 2.15 **MOD HP11 Policy HP4 Higher densities of residential development.** The Inspector recommended that schemes below 30 dwellings per hectare should be unacceptable in line with PPG3. However, the Local Authority consider that in exceptional circumstances, densities below 30 dwellings per hectare may be acceptable where matters such as the landscape and tree cover outweigh that general advice. An addition is proposed to the supporting text stating this. **Support.**
- 2.16 **MOD HP43 Policy H15 Removal of occupancy conditions.** The policy currently requires significant attempts to sell or lease a dwelling subject to occupancy conditions at an appropriately discounted rate and to persons who could occupy it in accordance with that condition. The inspector proposes the strengthening of this policy by replacing "*significant*" with "*convincing*". **Support.**

2.17 **MOD HC42 Policy R7 Noisy Sports.** This policy would be changed to give a more negative stance in consideration of proposals for noisy sports (with particular regard to the AONB). **Support.**

3. **Conclusion**

3.1 Many of the Inspector's proposals are minor, but it is encouraging that he has given stronger weighting to the protection of the AONB in several of his changes. The proposed additional reserve housing sites around Petersfield have been dealt with under a previous response, but it has been made clear by the Inspector that such sites within the AONB are to be considered as a last resort. Modifications to be particularly welcomed include the recognition of the importance of cumulative impact with regard to equestrian development and the inclusion of references to land outside of the AONB but within the proposed National Park.

3.2 The Local Authority have agreed with most of the Inspector's proposed modifications, and where their proposed text differs this is usually just an amendment to the way the modification is worded. There have been some occasions where the Local Authority has proposed additional modifications, and MOD HP11 and MOD GS11 are both examples of this.

3.3 The only points of objection are relatively minor. The retention of the reference to the A3 corridor may well be inappropriate if it suggests that certain parts of the AONB are more important than others, but it did at least highlight the particular development pressure for the land between this road and Petersfield. The other recommendation for objection is the text relating to the site at Leydene. This is on a point of principle as the size of the site and location could result in development that is inappropriate in the AONB and reversion of all, or at least part of the site to downland has previously been requested.

4. **RECOMMENDATION**

4.1 It is recommended that the comments sent to East Hampshire District Council as set out in Appendix 2 be endorsed or if following discussion, the Committee resolve to amend those comments, the revised comments be sent to East Hampshire District Council.

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South Downs Officer

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PLANNING COMMITTEE

10 OCTOBER 2005

DISTRICT-LEVEL HOUSING DISTRIBUTION - CONSULTATION

REPORT BY THE SOUTH DOWNS OFFICER

1. Introduction

- 1.1 Following public consultation in January – April this year, the Regional Assembly agreed the first part of the draft South East Plan that sets out region-wide policies. These include provision for an average of 28,900 new homes a year until 2026.
- 1.2 Part 2 of the Plan will present more detailed proposals for the nine sub-regions and housing provision figures for every district and unitary council in the region for the same period. Through the lead authorities for each sub-region, the Regional Assembly is now consulting on the district housing distribution figures. It has requested advice from those authorities by early December, with a view to Part 2 of the Plan being formally approved in March 2006 prior to submission to Government.
- 1.3 The Government will organise further statutory consultations before holding an examination in public. This will be conducted by a panel that will submit its findings and recommendations to the Deputy Prime Minister. Any further changes proposed by the Government will be the subject of further consultation before the Deputy Prime Minister publishes the final version of the new Regional Spatial Strategy by around Spring 2008.
- 1.4 At this stage the Joint Committee has been consulted by Hampshire County Council and the Partnership for Urban South Hampshire (PUSH), lead authorities for the South Hampshire sub-region; West Sussex County Council, lead authority for the Gatwick Area Sub-Region; and East Sussex County Council, lead authority for the Sussex Coast Sub-Region.
- 1.5 The Sub-Regional Strategies submitted to the Assembly at the end of October 2004 contained Visions for the Sub-Region. These Visions have influenced the proposed distribution of housing throughout the three counties. The Vision for the South Hampshire Sub-Region, which extends up to the southern edge of the Proposed National Park, includes addressing the economic regeneration and development needs of the area through ensuring the delivery of employment and housing sites, but that this is met in a sustainable way and that any growth is directly related to the provision of adequate infrastructure ('conditional managed growth').
- 1.6 The Vision for the Gatwick Area Sub-Region, the southern part of which overlaps part of the Sussex Downs AONB, includes providing adequate housing whilst, inter alia, protecting and enhancing the unique environment of the Sub-Region. The Vision for the Sussex Coast Sub-Region, which also overlaps part of the

Sussex Downs AONB, acknowledges, inter alia, the importance of protecting the high quality environment as a vital economic asset and seeks to moderate housing development to a level that both the economy and the environment can sustain.

- 1.7 The purpose of this report is to advise the Committee of the options for consultation and the implications for the South Downs, and to recommend comments to be made to each of the County Councils.

2. **Hampshire**

- 2.1 Of the agreed average annual provision of 28,900 new homes for the South East as a whole, the Regional Assembly has set a target of 6,100 homes per year during 2006-2026 (i.e. 122,000 over the whole period) for Hampshire. This is marginally higher than the average annual provision required for in the existing Regional Planning Guidance for the South East (RPG9).
- 2.2 The Assembly has broken this annual provision down into three areas as follows: 4,000 houses in the South Hampshire Sub-Region, 800 in Central Hampshire and the New Forest (including the East Hampshire AONB), and 1,300 in North Hampshire (part of a Western Corridor Sub-Region, a little way to the north of the East Hampshire AONB).
- 2.3 As stated in paragraph 2.1, the overall numbers are only very slightly higher than those in the current Regional Planning Guidance, but the proposed breakdown would lead to more in South Hampshire, less in Central Hampshire and the New Forest, and about the same in North Hampshire. Hampshire County Council/PUSH have proposed different strategies for accommodating the provision in each of the areas.

South Hampshire Sub-Region

- 2.4 The South Hampshire Sub-Region does not include land within the AONB/National Park, but it borders onto them and so the distribution options could have varying potential knock-on implications. 4,000 houses per annum would result in a total of 80,000 over the 20-year period. 11,000 of these are expected to be built on sites that have already been identified for housebuilding, and it is envisaged that a further 38,000 would be built on other brownfield sites within cities and towns in the Sub-Region. It is thus estimated that around 49,000 houses could be accommodated on previously developed land. This would leave a requirement for around 31,000 homes on other sites.
- 2.5 Two 'Strategic Development Areas' are proposed in the Sub-Region. One would be north of the M27 near Fareham, and would consist of approximately 10,000 houses (the alternative would be more urban extensions, but with less opportunities for increased facilities). The other would be located to the north and north east of Hedge End, near Southampton, with approximately 9,000 new houses. It is interesting to note that both areas are on the opposite side of the M27 to Southampton and Portsmouth.
- 2.6 This would leave an additional requirement for around 12,500 new houses elsewhere in the Sub-Region. Three options are given, and these are broken

down for each district. For Winchester District the options would be (A) 5,000, (B) 7,000 or (C) 8,200 new dwellings, and these would be provided mainly through extensions to Waterlooville and north of Whiteley. The options for the southern parishes of East Hampshire (Rowland's Castle, Horndean and Clanfield) would be either (A) 1,000, (B) 500, or (C) 800 new dwellings. Although all three parishes are partially within the AONB, the housing would be outside the boundary, but could still have knock-on effects, particularly options (A) or (C).

- 2.7 The allocations would have knock-on implications for the East Hampshire AONB. The Fareham Strategic Development Area would bring the urban area closer to the proposed National Park boundary at Wickham. Although there would still be a large gap, recreational pressures would increase in places such as the Forestry Commission woods at West Walk and the Meon Valley Cycle Path. Increased road traffic along the A32 would also be likely.
- 2.8 Of the three options for the allocation of the remaining housing in the Sub-Region, none seem to have an overall preference in AONB terms. Option A would result in the lowest total allocation for the districts surrounding the AONB, although it would see the greatest allocation for Havant and East Hampshire (the latter of which would only have a very small area of search for potential sites – Rowland's Castle, Horndean and Clanfield).
- 2.9 Option C would see a much higher allocation for Winchester District and Option B would result in a higher allocation for districts surrounding the AONB than A, but less than C. What is not clear, however, is the need for, and capacity to accommodate, new development within the settlements within and around the East Hampshire AONB. Without this fundamental information, it is difficult to comment confidently upon the proposal to site most of Winchester District's remaining allocation at Waterlooville or Whiteley or whether 1,000, 500 or 800 houses would be acceptable within East Hampshire's southern parishes.

Central Hampshire and the New Forest

- 2.10 106,000 houses are proposed in total for the South Hampshire Sub-Region and the North Hampshire Sub-Region (which is sufficiently far from the AONB/National Park as to not be of particular concern). This therefore leaves a requirement for 16,000 houses in the remaining area, which includes the East Hampshire AONB. Hampshire County Council/PUSH state that 14,000 of these are expected to be built on sites already identified for housing in Local Plans and on other sites within towns (3,700 expected in East Hampshire District and 3,200 in Winchester District). If these estimates are accurate, this would leave a requirement for a further 2,000 dwellings on greenfield sites in order to meet the Assembly's allocation, which would be an annual average of 800 dwellings.
- 2.11 Five options are given for the allocation of the remaining 2,000 dwellings. The first three options would see the whole allocation being accommodated by extending either Winchester (the Barton Farm area to the north), Andover, or Whitehill/Bordon (on land currently owned by the MOD). The fourth option would split the allocation between Andover and Whitehill/Bordon. The final option would see the expansion of a larger number of settlements, with East Hampshire and Winchester District receiving an allocation of 600 dwellings each. This would equate to 30 dwellings per year on greenfield sites in both districts.

- 2.12 The above options can be combined with the brownfield/previously identified sites to create highest and lowest annual estimates for Winchester and East Hampshire Districts. Winchester would see between 3,200 and 5,200 within the part that is not in the South Hampshire Sub-Region. This would equate to between 160 and 260 dwellings per annum, which compares with a past average of 255 in the period 1996-2004 (although this dropped to an average of 233 in 2001-2004).
- 2.13 East Hampshire would receive an allocation of between 3,700 and 5,700 in the area excluding the Sub-Region. This would amount to an average of between 185 and 285 per annum (past averages were 290 per annum 1996-2004 and 270 per annum 2001-2004).
- 2.14 If the 2,000 greenfield dwellings were concentrated in Andover, this would result in all developments in Winchester and East Hampshire Districts taking place on brownfield sites. However there are other issues to be taken into account. For example, much of the Whitehill/Bordon allocation would be on previously developed army land (although it could have potential negative impacts on the AONB and adjoining Special Protection Areas).
- 2.15 Splitting the allocation between Andover and Whitehill/Bordon may seem a compromise that meets housing needs around the AONB, whilst not overdeveloping the area. However, there is a serious negative point in that the additional facilities that would accompany a development of 2,000 dwellings, such as shops, schools, public transport etc (and which are needed in the Bordon area) would not be likely to be provided if the development was for a smaller number of dwellings. Whilst developing at Barton Farm would be positive for the housing needs in the Winchester Area, it would also be likely to require major junction improvements to the M3 within the boundary of the proposed National Park.

3. **West Sussex**

- 3.1 Of the agreed 28,900 new homes to be built each year for the South East as a whole, the Regional Assembly believes that West Sussex should plan to accommodate 2,900 pa (i.e. a total of 58,000 over the 20-year period of the South East Plan). This rate of development is almost exactly the same as that West Sussex was required to provide for in the West Sussex Structure Plan up to 2016 by existing Regional Planning Guidance for the South East.
- 3.2 The Assembly is seeking the County Council's advice on how to distribute these 2,900 houses between the seven Borough and District Councils of the county. The Assembly believes that about 1,400 houses should be provided each year in the Gatwick Area Sub-Region, about 1,100 in the West Sussex part of the Sussex Coast Sub-Region and thus about 400 in the rest of West Sussex (of which a large proportion is in the Sussex Downs AONB, although it also includes Pulborough and Billingshurst).
- 3.3 Nevertheless, the Assembly is also seeking advice on how many of the 2,900 houses should be allocated to the area around Gatwick and Crawley, the coastal strip and the rest of the county. The County Council is consulting on these issues.

- 3.4 In addition to the Visions for the Sub-Regions set out above, West Sussex has a strategy for areas of the county outside the Sub-Regions. This includes conserving and protecting AONBs; providing small-scale housing development in market towns where this supports the role of the town; and providing limited small-scale affordable housing, business and service development in villages to meet defined local needs and protect or extend key services.
- 3.5 Following a detailed assessment of the potential supply of land for housing for the period 2006-2026, the County and District Councils estimate that some 44,000 dwellings (76% of the overall requirement) are already committed or could be built on brownfield sites in each area under existing policies. That means that land for a further 14,000 houses will need to be found.
- 3.6 Again the County and District Councils estimate that 3,500 of those could be provided by increasing targets for the number of new homes to be built on brownfield land in Adur, Crawley and Worthing. In addition, the authorities estimate that a further 1,850 dwellings could be provided through small-scale greenfield allocations and the small-scale, gradual growth of villages and towns to meet local needs. An indication of how these might be provided by the rural districts is included within the consultation paper.
- 3.7 This therefore leaves 8,650 dwellings to be distributed. Discussions and work has indicated that there are different ways in which this remaining element of the housing requirement might be met. The consultation document does not set these out, which is unhelpful. Instead, the County Council is consulting on two broad scenarios for how the Assembly's overall housing figure for the county might be split between the Districts; a focus on the Gatwick Area or a focus on the coast and rural area, although each involve only a difference from the Assembly's proposed distribution (see paragraph 3.2 above) of a maximum of 100 dwellings pa.
- 3.8 For the area of West Sussex outside the two sub-regions, these scenarios propose 300 or 400 dwellings pa respectively. This would mean between 6,000 and 8,000 houses in the "rest of West Sussex" over the Plan period. If only 1,850 of those can be accommodated as small-scale gradual growth, where are the rest to go ? Of course, with 76% of the total requirement already allocated or acceptable under existing policies, much of the remainder for the rest of West Sussex may already be allocated, but greater clarity is required as to how many houses are proposed or expected for the rest of West Sussex over the Plan period – just the 1,850 or more?
- 3.9 The County Council sets out how the total provision of 58,000 houses could be distributed amongst the Borough and District Councils, taking into account all the considerations identified above. The distribution suggested would result in annual rates of development for Arun and Chichester Districts being below current Structure Plan levels '*reflecting environmental constraints*', but still with allowances (of 220 homes in Arun District and 630 homes in Chichester District) for small-scale, gradual growth as additions to existing settlements.
- 3.10 The annual rates for Horsham and Mid Sussex Districts would be increased from Structure Plan levels. The County Council suggests that the location of these additional houses will be influenced by the need to respect environmental

constraints, including AONB, but the suggested figures also include allowances (of 550 homes in Horsham District and 450 in Mid Sussex District) for small-scale, gradual growth as additions to existing settlements.

- 3.11 As for the implications of this proposed distribution on the AONB, the general recognition of the importance of the need to protect the environment of the Sub-Regions, and the particular emphasis given to protecting the AONBs in the rural area, are reassuring. It is clear that the main areas of development would not be within the AONB/National Park, but rather in the urban areas of Shoreham, Crawley and Horsham.
- 3.12 Of course, additional housing development of the magnitude proposed would have knock-on effects for the Downs in terms of increased traffic and recreational pressure. However, this is more a result of the overall level of housing proposed, on which the previous Board and JAC have already commented, than of the proposed distribution. In fact a proposed distribution with the major developments outside the AONB/National Park and, in the case of Crawley and Horsham, some distance from it, is to be welcomed.
- 3.13 Nevertheless, with the consultation document suggesting 1,850 dwellings as small-scale gradual growth, and potentially more from the proposed 300 or 400 dwellings pa there is likely to be some small-scale housing developments as additions to the larger settlements within the AONB. Such development may be welcome if it increases the availability of dwellings to those on lower incomes, but the location of new housing needs to be carefully chosen. The precise location of new housing sites will be a matter for each authority's local development framework, and the consultation paper makes this clear.
- 3.14 Of more fundamental concern, however, is that the justification for the number of houses proposed for the rural area is not clear. In particular, as with Hampshire, it is not clear whether this is just the residue to be accommodated after the capacity of the Sub-Regions to accommodate housing development has been calculated, or if, in fact, the numbers proposed have been calculated on the basis of the needs and capacity of the rural area for more housing.

4. **East Sussex**

- 4.1 Of the total of 28,900 houses to be built each year for the South East as a whole, the Regional Assembly proposes that 1,900 should be built in East Sussex/Brighton & Hove. Of these, 1,600 are expected in the Sussex Coast Sub-Region (assuming that the West Sussex authorities provides 1,100 pa in their part of the Sub-Region). Of those 1,600, Brighton & Hove City Council is consulting on the city providing 550 pa. This would leave the East Sussex authorities needing to find sites for 1,050 homes pa within the Sub-Region and 300 pa in the rest of the county.
- 4.2 The figure for the Sussex Coast Sub-Region is about 10% less than the current planned rate of development for the area, reflecting the conclusions of the Sussex coastal authorities in their advice to the Assembly last year. Overall, the 1,350 houses a year for East Sussex, excluding Brighton & Hove, are some 450 less than the number required by existing plans and 240 less than the average number of new homes built each year since 1991.

- 4.3 East Sussex County Council sets out how it proposes the 1,050 houses/1,350 houses should be distributed amongst the five districts/boroughs. The proposed 1,050 houses within the Sussex Coast Sub-Region equates to 21,000 houses over the period of the South East Plan. However, 17,500 (including 3,340 in Lewes District, 2,630 in Wealden District and 4,840 in Eastbourne) of those could be built on the large number of sites already committed for development and on other previously-developed land that is anticipated to become available for housing development during the Plan period.
- 4.4 Thus land needs to be found for an extra 3,500 houses on greenfield sites within the Sub-Region between 2006 and 2026. The County Council proposes that 2,000 of these be within Wealden, but none in Lewes District (due to the need to protect the AONB/National Park and other significant environmental constraints) or Eastbourne (due to the very limited opportunities following the completion of a major development at Sovereign Harbour).
- 4.5 Accordingly, within the Sussex Coast Sub-Region, it is proposed that, on average, 170 houses should be built each year in Lewes District (reflecting existing commitments and previously-developed land potential), 240 in Eastbourne Borough (again reflecting existing commitments and previously-developed land potential), and 230 in Wealden District (130 pa reflecting existing commitments and previously-developed land potential and 100 pa on greenfield sites).
- 4.6 The Wealden wards within the Sub-Region include East Dean and Alfriston and Polegate South, wholly or partly within the Sussex Downs AONB, but also a number of others to the north and east. Possible locations for the additional 2,000 houses include Polegate, Willingdon and/or Stone Cross, with possibly some limited development at Hailsham. However, the precise locations of this new development will be a matter for Wealden District through its Local Development Framework.
- 4.7 Of the 300 houses pa to be built in the rest of the county, 50 are proposed for Lewes District and 170 for Wealden District (the remaining 80 being for Rother District). However, that part of Lewes District outside the Sub-Region is also largely outside the AONB/National Park, with only part of the wards of Ditchling and Westmeston and possibly Plumpton, Streat, East Chiltington and St John (Without) being within. None of that part of Wealden District outside the Sub-Region is within the Sussex Downs AONB.
- 4.8 The only concern arising from the proposed distribution therefore is the possibility of a large development within Wealden District on the edge of the AONB/National Park. This threat could be reduced if fewer houses were proposed for Wealden District, but this would mean additional houses elsewhere i.e. (from a South Downs perspective) Rother District. However, the Rother District allocation of 1,000 additional houses is already dependent on transport improvements, and scope for further development is likely to be limited.

5. **Conclusion**

- 5.1 Both the former Board and the JAC were concerned that the overall levels of housebuilding in the draft South East Plan were based more on economic and

social factors than on the capacity of the environment to absorb the levels of new housing development and associated infrastructure.

- 5.2 Now that the overall level has been agreed by the Assembly, the issue is the distribution amongst the sub-regions and districts. Here, at least, the environment appears to be a more important consideration, although social and economic needs do still appear to dominate. However, because the justification for proposed housing numbers in the rural areas is unclear, it is difficult to comment with certainty.
- 5.3 For Hampshire, concern should be expressed about the possible knock-on effect of the proposed major development area at Fareham on the AONB/National Park. Given the proposed location of the remaining requirement for Winchester District at Waterlooville or Whiteley, both away from the boundary of the AONB/National Park, it is not considered that any of the proposed scenarios is more favourable to the AONB than the others, provided that some allowance is made for small-scale development if and where needed and acceptable within the AONB. However, for the southern parishes of East Hampshire, in the absence of any information justifying a higher figure, Option B would be preferable.
- 5.4 For West Sussex, the proposed distribution of the major developments outside the AONB/National Park and, in the case of Crawley and Horsham, some distance from it, is to be welcomed. However, greater clarity is required as to the anticipated or proposed numbers of houses in the "rest of West Sussex" in order to be able to gauge the likely impact on that rural area, and the AONB in particular. To assist in this, some indication of the need for additional housing development in that rural area and the capacity of the environment to absorb it is needed.
- 5.5 For East Sussex, the reduction in requirement relative to the number of new homes each year required by existing plans is to be welcomed. However, a main concern is the possibility of a major development on the edge of the AONB/National Park at Polegate or Willingdon. Nevertheless, given the apparent constraints in Rother and the comparative good transport links to Polegate/Willingdon, it is considered unlikely that some of the Wealden allocation could be redistributed to Rother. It is therefore suggested that whilst concern be expressed, no specific objection be made to the Wealden allocation, but that comments be made on any relevant proposals in the LDF in due course.
- 5.6 Importantly, it should be remembered that this consultation is being undertaken on behalf of the Regional Assembly by the lead County Councils, who will use the comments submitted to inform their advice to the Assembly. It is suggested that a copy of the comments submitted to each of the Councils be sent to the Assembly, to ensure that the Joint Committee's views reach at least the officers of the Assembly.
- 5.7 Finally, it should also be remembered that the annual house-building figure agreed by the Assembly was at the low end of the range suggested in the Draft Plan. With the Government's commitment to increasing house-building in the South East, it is considered likely that the Government will seek to increase the overall figure in due course. There will be an opportunity to comment at the appropriate time.

6. **RECOMMENDATION**

It is recommended that, following discussion by the Committee, comments be submitted to the respective County Councils based on the analysis in sections 2,3,4 and 5 of this report, with copies sent directly to the Regional Assembly.

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PLANNING COMMITTEE

10 OCTOBER 2005

PROPOSED CHANGES TO REGIONAL PLANNING GUIDANCE FOR THE SOUTH EAST (RPG9) – WASTE AND MINERALS

REPORT BY THE SOUTH DOWNS OFFICER

1. Introduction

- 1.1 Prior to the preparation of the South East Plan, the South East England Regional Assembly (SEERA) undertook a number of partial revisions of Regional Planning Guidance for the South East (RPG9). These reviews took a set form:
- public consultation on Draft Strategies;
 - public consultation on Proposed Alterations to RPG9;
 - Examinations in Public into selected issues;
 - reports of the EiP Panels submitted to the First Secretary of State;
 - public consultation (by the Government Office for the South East – GOSE) on Proposed Changes to RPG9;
 - adoption of Changes by the First Secretary of State.
- 1.2 Waste and minerals issues were the last of the partial revisions, the Regional Waste and Minerals Strategies Consultation Drafts being launched in 2003. These were reported to the former Conservation Board Planning Committee, which resolved to make a number of comments on each. The subsequent Proposed Alterations were also reported to the former Committee, and again a number of comments were agreed.
- 1.3 Copies of the submitted comments are attached as Appendices 1 (Waste) and 2 (Minerals) to this report. The former Board was invited to participate in the Examination in Public into the Proposed Alterations in October last year.
- 1.4 The Panel that conducted the EiP subsequently reported to the First Secretary of State and the Proposed Changes to RPG in respect of waste and minerals have recently been published. Comments on the Proposed Changes are requested by 11th November.
- 1.5 Although the Draft South East Plan has been published in the meantime, with policies on waste and minerals that were open to comment (and the former Board reiterated the comments it had made on the Proposed Alterations to RPG9), SEERA intends that these policies will be amended as adopted by the First Secretary of State. The purpose of this report is therefore to advise the Committee of the Proposed Changes to RPG9 in respect of waste and minerals and to recommend comments to be made upon those Proposed Changes.

2. Proposed Changes (Waste)

- 2.1 The former Board Planning Committee sought further recognition of the need to conserve and enhance the environment in Policy W17 on the location of waste management facilities. As an example, the former Committee suggested a recognition that large-scale (those serving the needs of more than the indigenous population) facilities would not be acceptable in protected landscapes.
- 2.2 In addition, the former Committee considered that the statements in Policy W18 on waste management development in Green Belts, National Parks and AONBs needed further qualification. It was felt that the proximity principle should not be the sole determinant of the location of such facilities as indicated in the Policy. The Committee sought further recognition of the importance of protecting the character and quality of National Parks and AONBs, ideally with a reference to the Best Practicable Environmental Option.
- 2.3 The Panel recommended the combining of Policies 17 and 18, but also that the circumstances in which small-scale local development would not be precluded in AONBs and National Parks be expanded to include *'where this would facilitate economic and social well-being of communities and would not compromise the objectives of the designation'*. Whilst proposing to combine the two Policies, the First Secretary of State proposes to add only the reference to the objectives of designation.
- 2.4 Whilst the First Secretary of State is not proposing to make any reference to large-scale facilities in AONBs or to the BPEO, the Proposed Changes are welcome for their addition of "small-scale" and "local" and the requirement for development not to compromise the objectives of designation. In fact, with that fundamental safeguard built into the policy, the additional safeguard of "small-scale" is somewhat superfluous; indeed, it could be argued that provided the objectives of designation were not compromised, large-scale facilities could be acceptable and even desirable if they met other objectives, such as consistency with the proximity principle or facilitated the economic and social well-being of communities.
- 2.5 As regards the well-being of local communities, with that basic caveat regarding the objectives of designation, the expansion of the circumstances in which waste management development would not be precluded in AONBs as recommended by the Panel to include this well-being need not be a concern. Indeed, there could even be merit in adding this reference as an additional circumstance (the other being where consistent with the proximity principle) where such development would actually be desirable provided that it did not compromise the objectives of designation.
- 2.6 Overall, it is considered safer for the revised policy to refer only to small-scale local development, but that no further presumption against large-scale facilities is required. However, the reference to the economic and social well-being of communities within AONBs is considered desirable. Therefore, although the Proposed Changes to the Policies improve it in terms of the protection afforded to AONBs, it is recommended that an **objection** be made to the failure of the First Secretary of State to accept the Panel's recommendation in this respect.

- 2.7 The former Board Planning Committee considered that the Waste Management Strategy should include greater references to financial incentives for waste management. Although the importance of financial drivers was acknowledged by parties at the Examination in Public, the Panel made no recommendations to this effect, considering that it was not a matter for the Regional Assembly. The First Secretary of State is not proposing any changes in this respect. It is recommended that this be reiterated as a **general comment**.
- 2.8 The former Committee also believed that the Strategy should clarify whether "landfill" also included "landraising" and set out how the delay in the granting of permissions for waste management facilities should be tackled. The Panel made a number of recommendations regarding the references in the Strategy to landfill, but not including the need for further clarification.
- 2.9 The Panel emphasised the importance of the Regional Assembly and GOSE arguing the strategic need for waste management policies in Waste Development Frameworks, Waste Planning Authorities doing the same for Local Development Frameworks and of monitoring any emerging gaps between capacity requirements and provision.
- 2.10 In respect of the latter, the Panel recommended that Waste Planning Authorities provide consistent data on waste management permissions granted, to be reported to the Regional Assembly (accepted by the First Secretary of State), although made no suggestions as to how bring such permissions forward in the event of an emerging gap between requirement and provision. (However, if applications are being submitted but being refused, then permission may be granted on appeal if there is an identifiable need for the facility). It is recommended that these be reiterated as **general comments**.
- 2.11 In addition, the former Committee agreed a number of general comments on waste management issues (as set out in Appendix 1). It is recommended that these also be reiterated as **general comments**.
- 2.12 The First Secretary of State also proposes a number of other changes, none of which are of particular significance for the Joint Committee or the South Downs.

3. **Proposed Changes (Minerals)**

- 3.1 The former Conservation Board Planning Committee supported Policy M1 of the Regional Minerals Strategy promoting sustainable construction practices as it considered that such practices reduce the demand for primary minerals. The Panel recommended that the policy be amended such that Local Development Frameworks should promote the use of construction materials that reduce the demand for primary minerals, by requiring development projects to include a proportion (unspecified) of recycled and secondary aggregates.
- 3.2 The First Secretary of State has accepted that recommendation and is proposing a change to the policy to that effect, although he has added "wherever practicable" as a caveat to the requirement. It is recommended that this proposed change be **supported**.

- 3.3 The former Planning Committee commented that the word “environmental” be reinstated in the first part of Policy M2 on environmental management, having been in the Draft Strategy but omitted from the Proposed Alterations. However, the Panel considered that this part of the Policy repeated national guidance and that the second part would be delivered through Policy M7, and therefore recommended its deletion. This has been accepted by the First Secretary of State. Nevertheless, it is considered that the policy was an important additional safeguard, and it is recommended that an **objection** be made to its deletion.
- 3.4 The former Committee believed that the statement in Policy M3 on Recycled and Secondary Aggregates and its supporting text that minerals recycling facilities should not be excluded from AONBs and National Parks needed to be qualified further. In particular, the Committee considered that the proximity principle should not be the sole determinant of the location of such facilities as indicated by Policy M3. The Committee sought a reference to the Best Practicable Environmental Option (BPEO) and the advice of PPG10 or PPG7 on the location of minerals facilities in AONBs.
- 3.5 The Panel noted that the Countryside Agency felt that there was an over-reliance on the proximity principle. It considered that there should be little need for minerals recycling facilities throughout most of the AONBs in the South East and the New Forest National Park, given their small-scale settlement pattern and fewer major infrastructure and redevelopment projects than in and around the main urban areas.
- 3.6 However, the Panel also recognised that *‘there may be circumstances of local geography, such as along the South Coast’*, where main urban areas had the sea on one side and AONB or National Park on the other. It felt that the Assembly’s use of the phrase *‘in exceptional circumstances’* as to when minerals recycling facilities might be allowed in AONBs acknowledged this situation.
- 3.7 The Panel considered that Policy M3 should expand on the tests to be satisfied for protected areas. It therefore recommended that only minerals recycling facilities for local materials should be permitted in AONBs and National Parks, and only then where the development would not compromise the objectives of designation.
- 3.8 The Panel also recommended changes to the supporting text to require Minerals Planning Authorities to have *‘specific justification’* for identifying suitable sites in designated areas; to highlight the benefits of a landscape character assessment approach to justify development in AONBs and National Parks; and to acknowledge that there are likely to be few circumstances where a justifiable demand for a minerals recycling facility could be made in AONBs or National Parks because of their geography and settlement pattern.
- 3.9 However, the Panel did not consider that Minerals Planning Authorities should have to demonstrate that any sites allocations in designated areas represented the BPEO, as they would have to incorporate Sustainability Appraisal/ Strategic Environmental Assessment into the preparation of their Minerals Development Frameworks.

- 3.10 The First Secretary of State has accepted these recommendations and has proposed changes to Regional Planning Guidance to reflect them. In fact he has also added "very" to the Assembly's "exceptional circumstances".
- 3.11 The proposed additional caveats to the proximity principle, as sought by the former Conservation Board, are to be welcomed. As with the Proposed Changes to the waste policies, the addition of the caveat '*where development would not compromise the objectives of designation*' rather makes the caveat of only local materials superfluous, but that caveat should be retained nevertheless as reinforcing the protection afforded by the policy to designated areas.
- 3.12 However, given that fundamental safeguard, to insist on materials recycling facilities being permitted in such areas only where they represent the BPEO as well would seem unnecessary. Likewise another caveat; that there are no alternative sites (as used in the earlier part of the policy relating to facilities within Green Belts), would also be unnecessary. It is considered that the proposed changes to Policy M3 provide adequate safeguards for the AONB and it is therefore recommended that the changes be **supported**.
- 3.13 The former Board Committee considered that a statement in the supporting text regarding extraction or processing of minerals in AONBs should be subject to a further caveat '*where suitable reserves are not available outside the AONB*'. However, the Panel did not consider this comment and it is therefore recommended that this comment be **reiterated**.
- 3.14 The former Committee also considered that the Strategy should acknowledge that the same test of national interest for major development within a National Park also applies to AONBs. Consequently the suggestion in the Strategy that this test might be a '*test too far*' for sand and gravel workings in a National Park, should also apply to AONBs. However, the Panel made no mention of this point in its report, and the First Secretary of State does not propose any changes to correct this anomaly. It is therefore proposed that this **objection** be reiterated (notwithstanding the conclusions of the Panel and Secretary of State on the overall level of sand and gravel provision – see below).
- 3.15 The Regional Assembly had in fact proposed that provision be made for 203 mt of land-won sand and gravel 2001-2016 compared to the national guidelines for the South East of 212 mt, having had regard to special circumstances put forward by Buckinghamshire, Oxfordshire and Surrey. This equated to an annual figure of 12.67 mt, 0.58 mt less than the current national figure, and 3.83 mt less than the previous level of 16.5 mt in MPG6.
- 3.16 The former Board Planning Committee supported the reduction in the Strategy of the apportionment of primary aggregates in East and West Sussex (and welcomed the lack of anticipated need for future chalk or clay workings) as a consequence of the reduction from the MPG6 figure.
- 3.17 However, the Panel considered that it had not been '*presented with a convincing case that the Region cannot meet its guideline on environmental grounds*', and felt that it had no alternative but to recommend that RPG9 make full provision for 212 mt. Consequently it considered how to allocate the additional 0.58 mtpa. The Panel report noted that it accepted the special cases for the

Buckinghamshire, Oxfordshire and Surrey and so proposed the distribution of the additional provision amongst the other counties/sub-regions.

- 3.18 As a consequence, it recommended an increase in the West Sussex apportionment from 0.87 mtpa to 0.91 mtpa (and in the Hampshire apportionment from 2.52 mtpa to 2.63 mtpa). However, because of the very small original apportionment to East Sussex (0.01 mtpa), the increase would have been negligible, and therefore the Panel recommended the retention of the 0.01 mtpa apportionment. The First Secretary of State accepts this recommendation and proposes to change RPG9 accordingly.
- 3.19 The new proposed apportionment for West Sussex compares with 1.4mtpa in MPG6. During the final stages of the West Sussex Minerals Local Plan in late 2002, the ODPM published a Consultation Paper entitled "Draft Guidance on Minerals Extraction in England". This proposed a decrease in the level of mineral provision for the South East region of some 37%, which reduced the West Sussex apportionment to approximately 880,000 tonnes.
- 3.20 As a result, the County Council was able to reject the Minerals Local Plan Inquiry Inspector's recommendation that three additional sites be added to the Plan, including one to which the former Conservation Board had objected at Cooper's Moor, near Duncton. The proposed increased apportionment for West Sussex therefore raises concerns that this site will be once again under threat.
- 3.21 Unfortunately, at this stage, it is not clear if this will be case, and it is likely to become clearer only when the Minerals Local Development Framework is at a more advanced stage. However, it is recommended that an **objection** be made to this increased apportionment because of the implications for the Sussex Downs AONB.
- 3.22 The former Conservation Board commented that the Strategy should contain greater reference to small quarries serving local areas which are necessary to retain order to provide locally distinctive materials and local employment and to reduce transport distances. However, the Panel did not acknowledge this point, and the First Secretary of State does not propose any changes in respect of it. It is recommended that this be reiterated as a **general comment**.
- 3.23 The former Planning Committee expressed concern about the unsustainability of transporting materials for cement manufacture in the South East over considerable distances, and sought further consideration of this issue. The Committee also believed that the Strategy should consider the general issue of transporting materials in greater depth.
- 3.24 The Panel noted that Policy M6 of the Strategy referred to the maintenance of a 25-year reserve of chalk for cement manufacture in Kent, but made no specific reference to transporting that chalk. However, the Panel did acknowledge the concerns over the transport of materials generally, given the probable extent of the Region's reliance on imported materials. It also noted that Policy M2, whilst promoting a modal shift, gave no indication how such a shift could be achieved.
- 3.25 The Panel was unclear how a modal shift could be achieved through development plans, but considered that the main means of promotion was via

the identification and safeguarding of key transport infrastructure. As this issue is covered by Policy M7, it recommended the deletion of Policy M2 (see paragraph 3.3 above). However, it also that the aim of achieving modal shift in the transport of materials be included in the supporting text to Policy M7, and that the policy be strengthened to require Minerals Planning Authorities to study transport needs.

- 3.26 The First Secretary of State accepts these recommendations and proposes changes to RPG9 accordingly. Given the increased emphasis on sustainable transport, it is not considered necessary to pursue the point about cement manufacture further, and the proposed changes to Policy M7 and its supporting text are to be **supported**. However, as previously recommended, an **objection** should be made to the proposed deletion of Policy M2.
- 3.27 The former Board welcomed the identification of sustainable development as a key principle in the Strategy but believed that it should clarify the process of environmental auditing for the Strategy. The Panel noted that the sustainability appraisal of the Consultation Draft concluded that the minerals strategy was largely supportive of sustainable development objectives, but made a number of recommendations intended to address particular concerns about areas designated for their environmental importance and marine sources. These have been accepted by the First Secretary of State, and comments on these proposed changes recommended elsewhere in this report. It is therefore proposed that **no further comment** be made on this point.
- 3.28 The former Planning Committee commented that the "Government View" procedure for marine dredging should have a greater degree of environmental input from local organisations. Similar concerns were expressed by other participants at the Examination in Public. The Panel endorsed the findings of a Government scoping study of marine aggregate extraction that concluded, inter alia, that other stakeholders are rarely involved in planning for marine dredging until the Government view procedure is indicated for a particular application.
- 3.29 However, the Panel considered that discussion of all of the issues raised in the study was beyond its remit, although added that the debate on marine dredging at the Examination in Public underlined the case for improvements in the planning and regulatory framework as recommended in the study. The Panel also noted changes in hand to replace the Government View procedure with the transposing into UK law of the requirements of the Environmental Impact Assessment (Marine Dredging) Regulations. It agreed with English Nature that a high quality environmental statement is the best guarantee of a Government View that satisfies the objectives for the sustainable extraction of minerals. The Panel made no recommendations, and the First Secretary of State is not proposing any changes, in respect of this issue.
- 3.30 Whilst such an environmental statement may indeed be an improved procedure, it could be argued that there should still be an opportunity for local environmental organisations to have an input. It is recommended that this point be reiterated as a **general comment**.
- 3.31 The former Planning Committee made two further comments, one referring to the stone extracted from clay pits and the other to its belief that the Strategy

should clarify what it means by the word "environment". The Panel made no specific reference to either in its report, and the First Secretary of State is not proposing any changes on these matters. Therefore it is recommended that both points be reiterated as **general comments**.

4. **Conclusion**

- 4.1 Minerals are an important issue within the South Downs, not only for the existing and potential sources within the designated AONBs, but also because of the potential demand for recycling sites close to the urban areas along the South Coast that may be within the Downs.
- 4.2 Whilst not all the points raised by the former Conservation Board have been addressed in the Proposed Changes, the First Secretary of State, in following the Panel's recommendations, is proposing the strengthening of some of the policies in a way that should be welcomed and supported. Nevertheless, objections should continue to be raised where the former Board's concerns have not been adequately addressed and where the Proposed Changes are considered to weaken RPG9.
- 4.3 It is therefore recommended that comments be submitted to GOSE as indicated in sections 2 and 3 of this report.

5. **RECOMMENDATION**

It is recommended that, following discussion by the Committee, comments be submitted to the Government Office for the South East on the Proposed Changes to Regional Planning Guidance for the South East (RPG9) on waste and minerals as indicated in sections 2 and 3 of this report.

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PLANNING COMMITTEE

10 OCTOBER 2005

WEALDEN DISTRICT

REPORT BY THE SOUTH DOWNS OFFICER

Application No: WD/05/2366/F

Proposal: Archaeological reconstruction site at the existing Sheep Centre

Location: Seven Sisters Sheep Centre, Gilberts Drive, East Dean

1. The Site

1.1 Seven Sisters Sheep Centre is located to the south of East Dean, on the road to Birling Gap and Beachy Head. The site of the proposed development is in the corner of an area of rough pasture separated from the main sheep centre complex by a post and wire fence, which lies in a shallow valley bounded by flint walls. Public bridleways run to the south and west beyond the flint wall bounding the site.

2. The Proposals

2.1 The proposal is to construct three buildings. Two of these, an open-sided "working" building (6.0m in diameter and 4.5m high) and a beehive roundhouse (3.0m in diameter and 3.5m high) will be specific reconstruction structures based on local Bronze Age evidence. The open-sided design of the "working" building would be specifically created to accommodate activities and events and to serve as a multi-purpose building.

2.2 The third building would be a large roundhouse, 12.0m in diameter and 6.5m high, able to accommodate 30-40 people. The supporting statement with the applicant suggests that this might be used to '*hold lectures, carry out storytelling sessions, carry out drama workshops and cook meals and carry out crafts and many other uses*'. The three buildings are shown on a photomontage enclosed by a low wattle fence.

2.3 The supporting statement also refers to display panels and a small museum display.

3. Assessment

3.1 The supporting statement explains that '*the buildings will be designed to give visitors a unique opportunity to experience what it must have been like to have walked into a house on the Downs some three and a half thousand years ago*'. The intention is that the site will be an educational experience for schools and family groups, helping to '*reveal the story of how the Downs came to be farmed and how people have managed and changed the landscape over the last ten thousand years*'.

- 3.2 The project is a partnership between the landowner and the East Sussex Archaeology and Museums Partnership. The supporting statement suggest that the "Beachy Head Bronze Age Centre" would be ideally placed to be a key point for landscape and historic interpretation at the eastern end of the national park.
- 3.3 The idea of providing an educational and interpretive resource for schools and visitors is, in principle, to be welcomed. However, there are considered to be three main issues with the application; the local plan policy context, the impact of the proposed structures and the additional activity that would be associated with them.
- 3.4 Although the supporting statement emphasises the educational value of the proposed development, it would also undoubtedly be a tourist attraction, supplementing the existing Sheep Centre. The Wealden Local Plan does not have any policies specifically for new educational resources in the countryside, but does have Policy TM1 on tourist attractions. This policy allows new or extended tourist attractions provided, inter alia, that the proposed development would respect and, where possible, enhance character, heritage and quality.
- 3.5 Turning then to the impact of the proposed development, it is relatively modest in terms of built development. The structures will obviously appear somewhat incongruous, especially when seen in the context of the more modern large agricultural buildings of the Sheep Centre. The structures would be visible from both the bridleway running to the south of the site and that running to the east, and possibly from the Beachy Head road in the distance viewed along the valley.
- 3.6 However, the structures would not be unattractive, and their setting in a slight valley would help mitigate their landscape impact, although the views up the valley are more open. Whilst a little away from the agricultural buildings, the buildings would be seen as being associated with the existing complex rather than as isolated features. Overall, therefore, it is considered that the visual impact of the proposed development would be acceptable, and that the proposal therefore complies with Policy TM1.
- 3.7 As regards activity associated with the proposed development, the supporting statement envisages a range of activities taking place within and around the buildings. No indication, other than the main roundhouse being able to accommodate up to 40 people, is given with the application as to anticipated numbers of visitors, perhaps because there are few parallels to this development that could give some indication.
- 3.8 General visitor numbers associated with the roundhouses may not be significant over and above those already visiting the Sheep Centre or travelling down to Birling Gap and Beachy Head. However, there may be peaks of activity likely to be associated with specific events at the site or school visits.
- 3.9 Main parking at the Sheep Centre is restricted, but there is believed to be overspill parking available, and there is parking in East Dean. Certainly provision for parking would be necessary to avoid having cars parked all along the road if visitor numbers were high at any time. It might also be desirable to control the nature, frequency and magnitude of events at the site so as not to detract unacceptably from the amenity of the locality, particularly the bridleways.

4. **Conclusion**

- 4.1 As stated above, the provision of an educational and interpretive facility for schools and visitors is, in principle, to be welcomed. It is considered that, although of an unfamiliar form and appearance in the 21st century, the proposed roundhouses would not have an unacceptable landscape impact and that the proposal complies with Policy TM1 of the Local Plan.
- 4.2 The only concern, therefore, is the need to ensure that adequate parking is available off-road, ideally within a screened location. It might also be desirable to control the nature, frequency and magnitude of events taking place at the site, although unless there is any similar restriction at the Sheep Centre, it might be hard to distinguish between an event associated with the site and an event associated with the Sheep Centre.

5. **RECOMMENDATION**

It is recommended that, following discussion, Wealden District Council be advised that:

1. The Joint Committee welcomes and supports, in principle, the provision of an educational and interpretive facility for schools and visitors.
2. The Joint Committee considers that, although of an unfamiliar form and appearance in the 21st century, the proposed roundhouses would not have a significant or adverse landscape impact. Consequently, the Committee believes that the proposals accord with Policy TM1 of the Wealden Local Plan.
3. The Joint Committee does, however, have one concern; that at times of large numbers of visitors, there may be inadequate parking available. The Committee would not wish to see parking along the roadside and therefore asks the Council to satisfy itself that adequate and appropriate parking space is or would be available.
4. Therefore, subject to that caveat, the Joint Committee supports this application. However, the Joint Committee considers that it would be prudent, if possible, to limit the nature, frequency and magnitude of events taking place on the site so as not to detract unacceptably from the amenity of the locality, particularly the bridleways that pass close to the site.

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PLANNING COMMITTEE

10 OCTOBER 2005

A26 TRUNK ROAD (ITFORD FARM BRIDLEWAY BRIDGE) SIDE ROADS ORDER

REPORT BY THE SOUTH DOWNS OFFICER

1. Introduction

- 1.1 The South Downs Way crosses the A26 between Newhaven and Beddingham at Itford Farm. Traffic speeds on the road are generally high (the national speed limit applies) and visibility is restricted. As a consequence the crossing is dangerous, especially for horse-riders. Although it did not specifically identify the A26, the South Downs Way Management Plans 1988 and 2000–2005 noted the dangers where the Way crossed major roads and noted that new bridges would be needed where appropriate. The 2000 Plan was specifically endorsed by the former Conservation Board.
- 1.2 In 2003 the Highways Agency commissioned consultants to undertake a feasibility study for the provision of a crossing at this point. Three options were originally proposed for the crossing; a subway, a bridleway bridge and an at-grade crossing. However, the at-grade crossing was not considered a viable option on safety grounds. The consultants therefore invited comments on the other two options, for which there were a number of alternative designs and indicative drawings.
- 1.3 Following discussions with the SDCB Planning Officer, the South Downs Way National Trail Officer responded welcoming the initiative and agreeing that an at-grade crossing would not be a safe option. The Officer also suggested that the alternative of a low subway tunnel requiring equestrians to dismount should be discounted because of the risks to riders and other users inherent in a tunnel full of horses.
- 1.4 The South Downs Way Officer therefore considered the acceptable alternatives to be either a deep subway or a bridge. On balance, the Officer preferred the bridge as being more welcoming to potential users, provided it was of an acceptable design suited to the location. These comments, and a few more specific points, were communicated to the consultants.
- 1.5 Since that time, officers have been involved in further discussions with the Highways Agency and East Sussex County Council over the design and mitigation measures. The Highways Agency has now published the Side Roads Order for the provision of the bridge crossing. Although the Order is accompanied by plans, reproductions of which are attached to this report, it has no elevational drawings of the proposed bridge.
- 1.6 Some idealised drawings were prepared and supplied to the former Conservation Board, but at the time of writing this report, the Highways Agency is reluctant to allow those to be in the public arena. They have not, therefore, been copied with

this report, but will be available at the Committee meeting to help members understand how the bridge may look.

- 1.7 As a Highways Agency scheme, the bridge will not require planning permission. The order is therefore the opportunity for a formal comment on the proposals to be made. The purpose of this report is to advise members of the proposals and to seek comments thereon.

2. **The Proposals**

- 2.1 The proposal is to provide a curved bridge over the A26 some 50m south of the present crossing point, with curving ramps on embankments either side to provide access, and to divert the South Downs Way so as to cross the bridge. Although not a Highways Agency responsibility, East Sussex County Council's Principal Landscape Architect has suggested reseeding the embankment sides with a suitable grass mix and native shrub species to mitigate their impact.

3. **Assessment**

- 3.1 There is no doubt that the existing crossing point is dangerous and that a segregated user/vehicular crossing is therefore desirable. The provision of a safe crossing in this way would also encourage those wishing to walk eastwards along the Way to park in the car park associated with the proposed use of Itford Farm on the western side of the A26 as a youth hostel. This in turn would allow the existing intrusive and unsafe informal parking area on the eastern verge of the road to be closed.
- 3.2 However, the problem is that both the accesses to a subway and a bridge would be visually intrusive. The issue is therefore then balancing the improvement for the South Downs Way and the potential removal of the informal parking area against the impact of any crossing structures on the landscape.
- 3.3 As explained above, a subway is also considered to be undesirable because it would be unwelcoming, potentially awkward if a number of users wished to use it at one time and require lighting. The bridge option is therefore the preferable option if a segregated crossing is to be provided. The objective is to site and design it so as to minimise its visual impact.
- 3.4 The general location for the bridge is constrained by the route of the South Downs Way – on the east side it descends the steep side of Itford Hill at an angle across the slope and on the west side it leads down to Southease Station and the bridge over the River Ouse. In fact, the location selected for the bridge is more open than some locations along the A26, which follows the valley side, but less so than some others.
- 3.5 Just to the north of the proposed crossing point there are trees, including some leylandii, associated with Itford Farm. As a consequence of these trees, and the buildings of Itford Farm, views of and from this stretch of the A26 from/to the wider valley are restricted and a bridge in this location would be less visually intrusive.

- 3.6 However, the preferred design for the ramps providing access to the bridge are a gentle curve – although this requires a greater land-take, such a form would be more sympathetic in the landscape. These gentle curving ramps would not be possible if the bridge was to be sited further north, which would necessitate distinct angular kinks in the ramps.
- 3.7 In addition, it has been suggested that a bridge closer to Itford Farm, a listed building, would detract from its setting. Finally, the preferred design also allows South Downs Way users to pass from Itford Hill to the bridge and vice versa without having to drop down into an unnecessary “valley” between them.
- 3.8 A bridge in the position proposed would have a particularly high visual impact when approaching from the north, being just where the road rises to a slight crest and views down and across the valley open out after the restricted visibility past the farm. However, this impact would be fleeting as the bridge would not be seen until coming round the bend just to the north of Itford Farm, and vehicles would pass under it quickly.
- 3.9 When approaching from the south, the bridge would be seen more in the context of the trees and building of Itford Farm, although still detached from them and would be seen from further away. It is anticipated that there would also be views of the bridge from and across the valley, although from these directions it would be seen against the rising ground of Itford Hill.
- 3.10 The bridge has to have solid sides to screen the road from horses crossing it. East Sussex County Council originally wanted the bridge to be made of local timber, but it was agreed that this could not be found in the volumes and specification required. In addition, to be strong enough, the bridge would have had to have a greater bulk. Accordingly, the bridge is proposed to be of steel girders clad with timber (from a certified source).

4. **Conclusion**

- 4.1 This is a difficult issue to which there is no ideal solution. Of course, the purpose of the AONB is only to conserve and enhance the natural beauty of the landscape rather than to provide improved access opportunities. Also, although the second objective of the Joint Committee is to provide opportunities for quiet informal enjoyment, this is only to be so far as is consistent with the first objective – to conserve and enhance natural beauty. There is therefore a significant argument that the bridge is unacceptable because of its visual impact and is not, in itself, a feature of particular beauty that would enhance the AONB.
- 4.2 However, the South Downs Way is a National Trail, the country’s only long-distance bridleway and enjoyed by over 100,000 users each year, the vast majority of them local people. The existing crossing is clearly unsafe, and any accident would of course be a tragedy. The former Conservation Board recognised the desirability of improving this. In addition, the former Board has previously provided a new bridge for the South Downs Way, in the Arun Valley, which has a significant visual impact.
- 4.3 It is considered that a bridge is a preferable solution than a subway, and it is recognised that the specific location proposed is due to the desirability of gentle,

curving access ramps. It is also considered that, given the necessary constraints, the design of the bridge is the best likely to be achieved.

- 4.4 On balance, it is considered that no objection should be made to the Order, subject to the bridge being of the design, materials and finish as already agreed with officers of the former Conservation Board and East Sussex County Council, or as otherwise agreed with officers of the Joint Committee and County Council, and the embankments being reseeded with an appropriate seed mix and native shrubs.

5. **RECOMMENDATION**

It is recommended that, following discussion by the Committee, no objection be made to the A26 Trunk Road (Itford Farm Bridleway Bridge) Side Roads Order 200, subject to the bridge being of the design, materials and finish as already agreed with officers of the former Conservation Board and East Sussex County Council, or as otherwise agreed with officers of the Joint Committee and County Council and the embankments being reseeded with an appropriate seed mix and native shrubs.

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