



## Draft Development Plan Document SA25 – Land west of Selsfield Road, Ardingly

### Executive Summary for the MSDC Scrutiny Committee

#### Background

SA25 is a proposed site for the development of 100 dwellings on an area of land that lies wholly in the High Weald Area of Outstanding Natural Beauty and borders both the village conservation area and the built-up boundary of the village.

It also straddles the Saxon settlement in the west and the Medieval settlement in the east that together comprise the village of Ardingly.

Ardingly Parish Council formally adopted the position that “the size of SA25 is too large” in January 2020.

Ardingly Parish Council believe this position is supported by much of the village as evidenced by the responses published after the MSDC Public consultation period. This paper sets out why Ardingly Parish Council believe that SA25 is a “Major development” and how MSDC planning authority have not justified a “Major” development in the High Weald Area of Outstanding Natural Beauty (AONB)

Ardingly Parish Council would like to take this opportunity to sign post <http://www.ardingly.org/> where APC’s full comments on SA25, that were submitted as part of the 1<sup>ST</sup> MSDC Public Consultation can be viewed.

#### Conclusion

Ardingly Parish Council believes SA25 constitutes **MAJOR** development within the AONB under NPPF paragraph 172 and the local planning authority has not justified why there is an overriding need for this scale of development in the AONB, that can’t be met elsewhere in Mid Sussex.

Ardingly Parish Council also believes that the location of SA25 fails to take into account the following;

- The previously evidenced need to preserve the separate identity of the two settlements of Ardingly village
- The impact on the Conservation Area and Heritage site at the western side of the proposed development
- The impact of a development, of this scale on the size of the existing village.
- The impact of the increased traffic in the village

#### Recommendation

To address these conclusions, Ardingly Parish Council requests that MSDC make a substantial reduction in the number of dwellings on and the footprint of SA25, and that the build area be restricted to the eastern side of the site.

The western side of the site should be allocated as Green Space and a planning restriction agreed to prevent future development. Ardingly Parish Council would like to make MSDC aware that they resolved at an Extraordinary Meeting of the Parish Council held on the 26<sup>th</sup> of February 2020 that should a substantial reduction in the number of dwellings on and the footprint of, SA25 not be achieved, Ardingly Parish Council will seek to remove SA25 from the DPD.

## Supporting Information

### Ardingly Parish Council position

Ardingly Parish Council completed a review of the Site Allocations Development Plan Document as part of the (1<sup>st</sup> stage) MSDC Public Consultation process in November 2019. During the review of this document Ardingly Parish Council identified a number of concerns within the selection criteria of SA25 and highlighted these concerns as part of that process to MSDC.

Further to those comments submitted in November 2019, Ardingly Parish Council **OBJECT** to a development of the scale proposed at SA25 and at their meeting on the 7<sup>th</sup> of January 2020 resolved to adopt a stance to this effect, as follows;

#### **“The size of SA25 is too large”**

Ardingly Parish Council believe that the allocation of SA25 constitutes MAJOR development under NPPF paragraph 172 in terms of its impact on the High Weald AONB. The Local Planning Authority has not demonstrated that exceptional circumstances exist in support of this development, taking account of the development’s nature, scale and setting and whether it could have a significant adverse impact on the purpose for which the AONB has been designated. The LPA has not explained why this scale of development cannot be met elsewhere outside the designated landscape.

Ardingly Parish Council does not believe The LPA has provided justification for this “Major” Development in the AONB, Section 85 of the Countryside and Rights of Way Act requires local authorities to have regard to ‘the purpose of conserving the natural beauty of AONBs’ in making decisions that affect the designated area.

### Justification

The proposal for Ardingly to receive 100 dwellings on SA25, would mean an increase in the size of the Parish by over 13%. Please note that:

- The Site selection criteria created by MSDC for SA25 already recognises the scale of this development as ‘significant for the size of the existing village’.

### **Conclusion: This would define SA25 as a “Major” Development.**

In response to this Ardingly Parish Council urge MSDC to give further consideration to the following statement taken from Chapter 15 of the NPPF; Conserving and enhancing the natural environment, paragraph 172 that states;

*“The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.”*

Ardingly Parish Council does not believe that there are exceptional circumstances or that a development of this size is in the public interest. In determining this Ardingly Parish Council have made assessments against the following points (as set out in NPPF para 172):

#### **a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;**

Ardingly Parish Council’s view on the need for development:

- There is no local need for a development of this size. Ardingly’s identified housing need in the Neighbourhood plan (2014) was for 37 new dwellings. Since this time Ardingly has completed 53 new dwellings. The residual requirement as set out in the DPD for Ardingly as at 1<sup>st</sup> October 2019 is for 22 dwellings between 2019-2031. The SA25 development is **5 times** the residual requirement.

- There is no identified national requirement for a development of this size in the AONB with the DPD residual requirement of 1,507 dwellings for MSDC being delivered by the Category 1 and Category 2 settlements and there is sufficient buffer to deliver this required residue with the other sites that are covered by the three identified options.
- The impact on the roads in and around the village have not been fully investigated. Previously, S106 funds have been allocated for traffic calming on the village high street. However, WSCC Highways Authority have informed Ardingly Parish Council that Ardingly Village High Street is not suitable for previously suggested traffic calming measures, so any future suggestions may also not be accepted.

**Conclusion: SA25 is a “Major” development and there is no exceptional or public interest requirement for this scale of development in the AONB.**

***b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way;***

Ardingly Parish Council believes there is scope within the site allocations in Category 1 and 2 and the buffer created to deliver the 1,507 residual dwellings from options 2 and 3 referenced in the minutes of the MSDC Scrutiny Committee for Housing, Planning and Economic Growth held on Wednesday the 11<sup>th</sup> September 2019, without developing this site.

***c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.***

Ardingly has two distinct centres; the older Saxon settlement in the west and the later medieval settlement in the east. As is common with other dual centre settlements in the High Weald the separation between these two settlements is a part of Ardingly’s character and supports the reading of its historical settlement pattern whilst also continuing to preserve the identity of these two settlements.

The proposed SA25 development will join these two settlements, adversely affecting the character of this historic village and its direct border to the conservation area, again causing the nature of the current village to be compromised.

All Local Authorities have “signed up” to The High Weald Management Plan 2019 to 2024, an objective of which is as follows;

**Objective S2: To protect the historic pattern and character of settlement,**

To protect the distinctive character of towns, villages, hamlets and farmsteads and maintain the hinterlands and other relationships (including separation) between such settlements that contribute to local identity.

Ardingly Parish Council suggests that MSDC consider their responsibility to this Management Plan in terms of SA25.

A previous proposal for development that threatened the identity of these two distinct settlements was found not to be in accordance with NPPF

Ardingly Parish Council would like to reference the following document as evidence of this precedent

Appeal Ref: APP/D3830/A/12/2172335

Land known as Butcher’s field, South of Street Lane, Ardingly, RH17 6UL

*“The harm to the character and appearance of the village would be of a very high order as it affects the long-term pattern of development within the village. Therefore, substantial weight is attached to the adverse effect in this regard. In addition, there would be significant harm to the AONB, conflicting with local and national policy. When considered together, the adverse effects would significantly and demonstrably outweigh the aforementioned benefits arising from the scheme. In accordance with paragraph 14 of the NFPP, the scheme would not be sustainable development”.*

**Conclusion: The harm to the character and appearance of the village from SA25 would be severe as it affects the long-term pattern of development within the village.**

The Planning Policy document for SA25 states that the development will be informed by a 'landscape led masterplan'. This should include:

- *Analysed not just the site, but its wider landscape and topographical setting, and its relationship to existing woods, fields, built settlement and routeways, to ensure robust understanding of the essential character of the area?*
- *Identified existing views into and through the site that need to be maintained and incorporated into the layout?*
- *Studied historic maps to understand the evolution of the site/area and identify key historic features and considered if opportunities exist to reinstate historic features, hedges and routeways to reinforce 'sense of place'?*
- *Identified existing site features, such as species rich grassland, water features or field boundaries, and taken the opportunity to retain, proactively incorporate and enhance these in the scheme?*

## **Summary**

If SA25 is accepted to be a "Major" development by MSDC and any exceptional circumstances cannot be justified, Ardingly Parish Council feel the size of SA25 must be substantially reduced to a size that ensures that the development not be considered a "Major" development.

The historical hedgerow annotated in the Fig.1 (below) should be reinstated in accordance with the Objective FH2 of the High Weald AONB Management Plan and development limited to the eastern side of that boundary, which will achieve the following;

- a reduction of the proposed size of SA25 to a size that might not be considered a "Major" development
- the preservation of the two distinct settlements within the village with an organic and historical landscape led boundary
- mitigation of the impact on the conservation area and heritage site

Ardingly Parish Council would again like to reiterate to MSDC that should a substantial reduction in the number of dwellings on and the footprint of SA25 not be achieved, Ardingly Parish Council will seek to remove SA25 from the DPD.

**Fig.1: SA25 showing impact on village**

