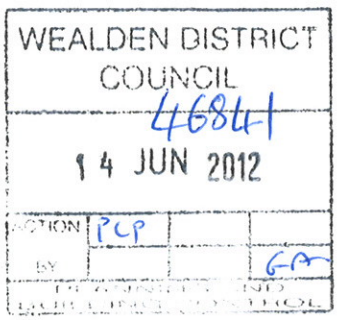
106106

EVERSHED, D

11 June 2012

Head of Planning and Environmental Policy
Wealden District Council
Council Offices
FREEPOST SEA 10959
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TN6 1BR



Dear Sir,

Representation on Proposed Modification to Core Strategy for Heathfield, reference MM20 and MM25

I enclose my representation regarding the main modifications to the Wealden Core Strategy, reference MM20 and MM25.

The Inspector has required a main modification to the Core Strategy as it relates to Heathfield. As described by the Council the modification involves:

Deletion of SD11 in Heathfield but the Council to undertake a review of the development needs of the town and the opportunities within it in the context of national policy in PPS7 as part of a subsequent Development Plan Document. Any housing sites identified as a result of this would be in addition to the total provision made in the Core Strategy.

1. The Inspector proposes ....
Delete:

"Development at Heathfield (SD11) will be phased for early in the plan period and this will enable much needed social housing to be provided"

and replace it with:

At Heathfield consideration will be given in a subsequent DPD to the identification of housing sites having regard to national policy on AONBs and any opportunities for redevelopment within the town. Any housing land identified will be in addition to the overall District provision of 9440 dwellings."

2. My Representation

I agree with the Inspector that given the high landscape value of site SD11 at Heathfield, it should not be allocated for development.

However, there remain the issues of

a) the shortfall of identified housing sites compared with the target set in the SE Region Plan, and

b) the recognised need for more social housing in Heathfield

3. Points relating to the new housing shortfall in the Core Strategy

As pointed out in the Inspector's letter to the Council about the Core Strategy modifications (dated 5 March 2012), there is a limit on house numbers in South Wealden because of the constraint on water treatment capacity. Similarly there is a limit on new housing sites in North Wealden because of the effect of nitrogen desposition on Ashdown Forest SAC.

Being in the centre of the District, Heathfield is not subject to the same constraints as either North or South Wealden. Therefore, careful expansion at Heathfield should be considered to close the gap with the new housing targets in the SE Region Plan. For the reasons set out below, this is despite the AONB designation coming up to the edge of the existing town boundary.

4. Points relating to the potential sites at Heathfield

a) SD11 at North West Heathfield

In the Landscape Character Assessment and Development Option Evaluation Study February 2009, site SD11 was given only a 'medium' rating for 'potential development' because of its high landscape value. However, there are three sites in Heathfield with a 'high' rating for potential development.

Consequently the Inspector is correct to remove SD11 from the Core Strategy proposals for development

b) Alternative site at North West Heathfield – Tilsmore (SHLAA) 149/1210

The land at Tilsmore included in the SHLAA as reference 149/1210 is preferable to SD11 as a site for housing development. It is close to the town centre. The distance of the site from amenities is as follows: a nursery school (300m); a primary school (300m); doctor, dentist, and chemist (900m); a post office (1000m); supermarket (700m); playing pitches (400m); and multifunctional green spaces (400m).

Whilst this site is in the AONB, it has a low landscape value and visual sensitivity. In the Landscape Character Assessment and Development Option Evaluation Study February 2009, the site was rated 'high' for 'potential development'. The associated Landscape Character assessment sheet for the site (sheet F) describes it as "*farmland over grown and derelict weed driven.*"

The 2009 Landscape assessment of the Tilsmore site continues:

The area has an ability to accommodate change, but anything other than 2 storey dark coloured housing (set low on the site and surrounded by trees) would threaten the views in. Area is in the AONB but has neglected and degraded landscape.

So whilst this site is in an AONB, not all AONB's have high value landscape. The low value of the landscape at this site is also supported by the Heathfield District Plan 1973 as set out below.

5. Heathfield District Plan 1973

The physical landscape has changed little since 1973 except some trees were blown down in 1987 and of course some younger trees have now reached maturity.

The Heathfield District Plan prepared in 1973 by the County Planning Officer used a Landscape Survey carried out in 1967/68 by K.D. Fines MRTPI, AILA. This survey used a scale of values ranging from one (undistinguished) to ten (superb) to assess the relative values of the landscape. See details and map attached which are an extract from the 1973 Heathfield District Plan.

From the map enclosed it is apparent that site SDA11 is in an area with landscape valued highly as eight, whereas the alternative site at Tilsmore, SHLAA reference 149/1210 and marked yellow on the map, is rated as three.

This 1967/68 landscape evaluation puts a sharper differentiation on the relative landscape merits of alternative sites. Thus the 'high' development potential of the Tilsmore site assessment in the 2009 Landscape Character Assessment is backed up by the relatively low landscape value of three in the more detailed Landscape Survey in 1967/68.

6. National Planning Policy Framework

Whilst the Council refers to considering the development needs of Heathfield in the context of PPS7, this has now been replaced by the NPPF. In particular paragraph 116 of the NPPF states the following considerations to be taken into account for exceptional developments in designated areas such an AONB:

- 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;

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

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

In my view the low landscape value of the Tilsmore site coupled with the local need for social housing and the District need to increase new house numbers enables it to meet the exceptional circumstances set out in the NPPF.

Therefore, the Inspector should require the Council to incorporate the Heathfield Tilsmore site (SHLAA ref 149/1210) in the Core Strategy.

I wish to be notified of the publication of any further Examination Hearings held by the Inspector and any further recommendations he may make. Furthermore, having participated in the previous examination hearings, I would wish to attend any further hearings to consider the main modifications to the Core Strategy.

Yours truly

Dr David Evershed

EAST SUSSEX COUNTY COUNCIL

HEATHFIELD DISTRICT PLAN

DISTRICT
COUNCIL
14 JUN 2012
BY

L. S. Jay, C. Eng., F.I.C.E., M.R.T.P.I., F.I.Mun.E.
County Planning Officer

Project Team

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March 1973

2.8 This policy recognised the inevitable attraction for inward migration of those towns in the London-Brighton corridor with good rail services to the Metropolitan Area, but proposed that an effort should be made to divert population growth arising from inward migration to the less populated parts of the County.

2.9 The Written Analysis of the County Development Plan stated that the reception of population into the County must be based mainly on the reasonable extension of existing towns and major villages.

2.10 Pressure for residential expansion has continued and although much of this has been in the Crawley-Brighton corridor some growth has also been diverted to other towns with good rail communications (such as Crowborough and Uckfield) or where there are good local employment opportunities (such as Hailsham). Heathfield has neither of these attributes (even before the closure of the railway, the journey to London was slow and tedious) but has nevertheless seen significant growth on a smaller scale as a residential town. This growth has been in accordance with the County Policy of concentrating growth in existing towns and major villages.

C. PHYSICAL FACTORS

2.11 A comprehensive survey has been carried out in order to determine the physical factors which limit the growth of Heathfield and the extent to which the town could ultimately expand without conflicting materially with these limits and without losing its essential character. These factors are discussed here and summarised in Fig.6.

Aesthetic/Landscape

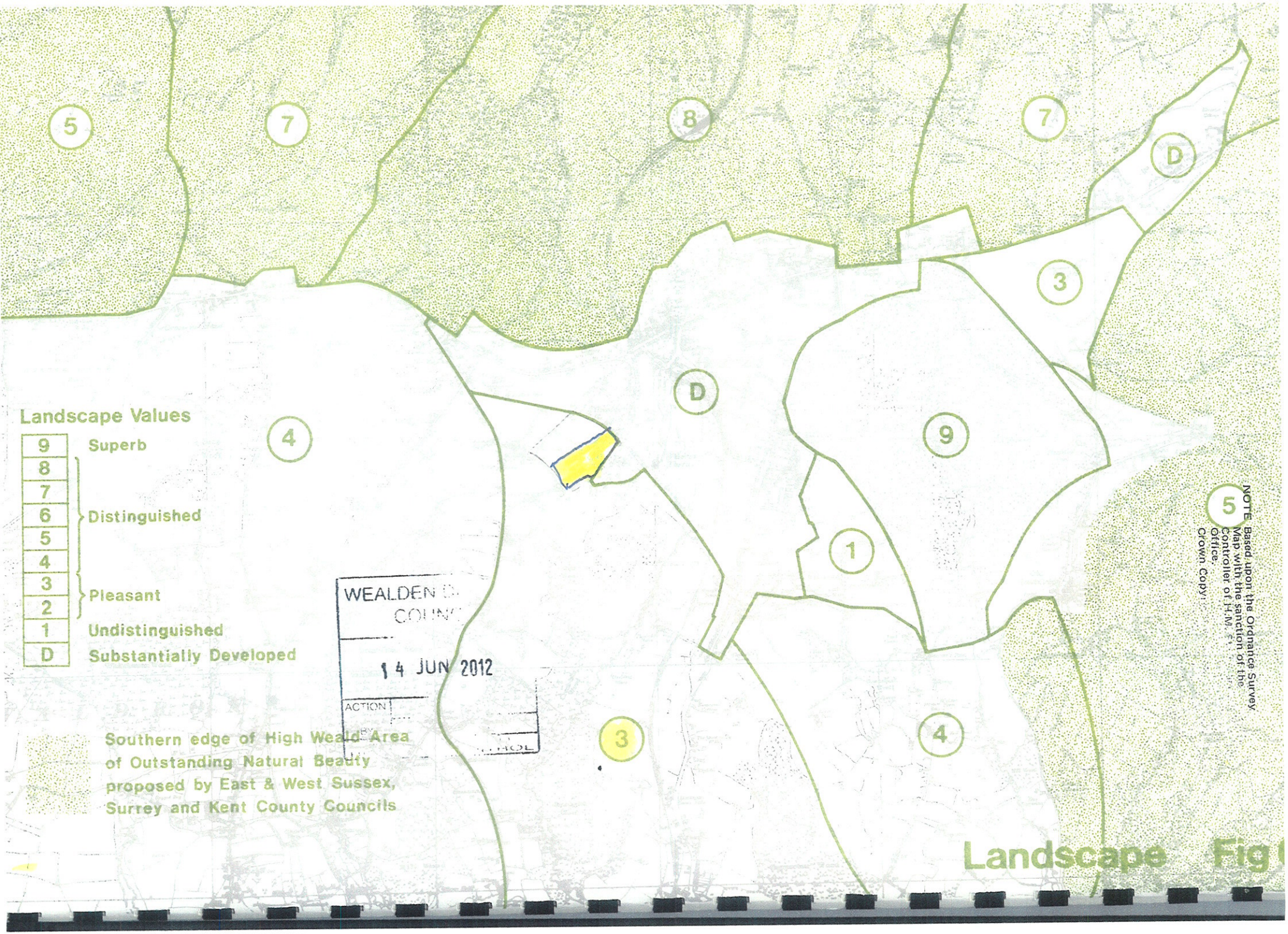
2.12 Heathfield itself has few buildings of architectural merit and relies for its attractiveness on its rural setting in high quality landscape. It is important, therefore, that existing viewpoints should be preserved to protect the outward view and wherever practicable to retain existing tree cover within Heathfield.

2.13 Of the surrounding villages, Old Heathfield possesses the most distinctive character and includes a number of buildings of architectural or historic interest. The pleasant appearance and informal arrangement of buildings is in sharp contrast to the modernity of Heathfield and is well worthy of conservation.

2.14 Heathfield's position on the Southern Forest Ridge (Fig.3) affords it excellent views over the surrounding countryside as far south as the South Downs and over the High Weald to the north. The undulating character of the Weald provides a special attraction which is characteristic of this part of the Country and which warrants careful consideration in any proposal for urban development.

2.15 A Landscape Survey for East Sussex[1] was made in 1967/68 and reference has been made to this in assessing the relative values of the landscape surrounding Heathfield. This survey displays a scale of values ranging from "one" (undistinguished) to "ten" (superb) though the District Plan has areas in the scale one to nine only, described as undistinguished to distinguished (see Fig.6).

1 Landscape Evaluation: A Research Project in East Sussex
K.D.Fines MRTPI, AILA. Pergamon Press 1968


Landscape Values
9 Superb
8
7
6 Distinguished
5
4
3 Pleasant
2
1 Undistinguished
D Substantially Developed
Southern edge of High Weald Area of Outstanding Natural Beauty proposed by East & West Sussex, Surrey and Kent County Councils
WEALDEN D
COUNC
14 JUN 2012
ACTION
BY
SCHOOL
5
7
8
7
D
3
D
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1
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5
NOTE Based upon the Ordnance Survey Map with the sanction of the controller of H.M. S. Office. Crown Copy
Landscape Fig

2.16 The areas to the north of the A265 and to the east of Cade Street and Old Heathfield are included in the suggested High Weald Area of Outstanding Natural Beauty in recognition of their special landscape quality. This suggestion is now before the Countryside Commission.

2.17 It is considered that landscape factors impose a major constraint on the large scale growth of Heathfield, particularly to the north where the landscape is considered to be of particular value. Thus any expansion must be selective in order to avoid the areas of special scenic quality. It is also important that areas of woodland should be preserved from development as far as possible.

Relief

2.18 The steep-sided ghylls provide slopes which are too sharp to permit residential development and on the northern slope facing Mayfield the gradient, though not steep, is sufficient to make development difficult. The area is well drained naturally and there are no significant areas liable to flooding. Other topographical factors do not appear to present obstacles to future development.

DISTRICT
14 JUN 2012

Natural Environment

2.19 The Nature Conservancy intends to designate Heathfield Park as a Site of Special Scientific Interest as it is considered to be one of the forest relics of the High Weald. The main ghyll stream in the Park has a number of comparatively rare plants with a particularly rich bryophyte flora. The effect of this designation would be that the Nature Conservancy must be consulted before any planning permission may be granted on the affected site and any development proposed should, therefore, have regard to this special scientific interest.

2.20 Other areas of general scientific interest are: Whitehouse, Heatherden, Markly, Pheasant and Gameland Woods, thus adding strength to the desirability of preserving these areas of woodland. Selwyn Wood is owned by the Sussex Naturalists Trust and its protection is assured.

Agricultural

2.21 Dairying predominates in the agriculture of the area with some beef and sheep and a limited amount of cereal production. The choice of crops is limited mainly to grass and cereals, except in a few small areas where better soil texture and improved drainage permit some horticultural cropping.

2.22 The soil is composed entirely of Ashdown Sand of no more than average quality by National Standards, so that considered alone, agricultural factors would not constitute a major restrictive factor to future development at Heathfield.

2.23 There are some large farms of over 100 acres, principally to the east of Heathfield, and the remainder are fairly evenly distributed in the range 30-100 acres and below 15 acres. Areas of development should be selected to avoid splitting or diminishing existing farms and preferably located on land which does not form part of a viable farm unit. The preservation of areas of dedicated and approved woodland (which are grant-aided by the Forestry Commission) is already urged on amenity grounds.