

Mid Sussex District Council

District Plan Review

## **Hearings Action Points – AP-013**

### **Duty to CoOperate**

Appendix D4:

Agendas/Minutes/Notes – South Downs National Park

November 2024



## Meeting with MSDC and SDNPA

31 08 22

### Meeting Note and Actions

Katharine Stuart – SDNPA

Lucy Howard – SDNPA

Jennifer Hollingum – MSDC

Alice Henstock – MSDC

1.	<b>SDNPA Update</b> – Started Local Plan review in May. Undertaking a call for sites. Undertaking a needs assessment. A bespoke study looking at overall need figure; disaggregated figure for each District within the National Park based on the standard methodology numbers; need figures for individual settlements in the National Park. Nov time to discuss with the Districts.
2.	<b>MSDC Update</b> – Since Jan 2022 report, have been working to address actions including undertaking a Previously Developed Sites Study (Troy consultants) and holding Member Working Groups to look at evidence and site selection. Officers working towards going back to Council in Autumn with Reg 18 consultation before Christmas but timetable to be confirmed.
3.	<b>MSDC SDNP Topic Paper</b> – JH explained the work done to date. LH flagged need to be mindful of ‘Adverse Impact’ – see NPPF. JH flagged site 799, significant site at Sayers Common due to scale, although MSDC conclusion no impact on setting
4.	<b>General discussion</b> – water neutrality, Ashdown Forest, future engagement from SDNPA (clarity of position), biodiversity net gain sites
<b>ACTIONS</b>	
1.	LH to speak to Winchester about sharing a confidential report on sites within the NP’s setting
2.	MSDC to send SDNPA the draft topic paper for review within the next week.
3.	SDNPA to provide feedback on draft topic paper
4.	SDNPA to update MSDC if any sites have been put forward within Mid Sussex District for biodiversity net gain or offsetting as there may be opportunities to work strategically on nature recovery and ecological corridors

**From:** Katharine Stuart [REDACTED]  
**Sent:** 04 October 2022 17:08  
**To:** Jennifer Hollingum; Alice Henstock  
**Cc:** Lucy Howard  
**Subject:** RE: MSDC | Topic Paper - Setting of the SDNP: Assessment of SHELAA Sites

Hi Jennifer and Alice,

Thank you for the opportunity to provide comments on the Mid Sussex Setting of the SDNP topic paper and we really support the principle of undertaking this work.

We have some comments to make, first on the preamble of the paper, and then on the sites and their assessments.

#### Preamble comments

- 1.4 of the paper states that eight SHELAA sites have been assessed. The paper would benefit from an explanation of how the sites were selected as part of the methodology. I note that there are many other sites in similar locations shown on the 2021 SHELAA maps and I'm unclear why these eight have been selected over any others.
- 2.2 I'd suggest a rephrasing on the lines of 'The Local Plan is landscape-led and seeks to deliver ecosystem services. The Local Plan is based on the statutory purposes and duty for national parks'
- In the legislative and policy context reference should be made to the Vision and Circular 2010 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/221086/pb13387-vision-circular2010.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/221086/pb13387-vision-circular2010.pdf)
- 3.5 says that policy DPC5 has been reviewed and considered suitable with no amendments. We would flag the new wording on setting in para 176 of the NPFF and suggest amendment of the policy to include a requirement for development to demonstrate that adverse impacts are avoided or minimised.
- 4.3 a further piece of evidence for those sites near the boundary of the National Park is the boundary report from the designation of the SDNP – LP11 in our Core Document Library <https://www.southdowns.gov.uk/planning-policy/south-downs-local-plan/local-plan-evidence-base/core-document-library/submission-documents/>  
I would also draw specific attention to the Viewshed Study and Roads in the South Downs to this list. I'd also advise specifically which landscape character assessments are being used (e.g. the South Downs LCA 2020). Historic maps are also an important resource for understanding how a settlement has evolved over time and its character.
- 4.5 the last sentence could benefit from being its own paragraph and be expanded further. We advise that if these sites are taken forward for allocation that Mid Sussex as LPA should identify the capacity of the site taking a landscape led approach (sensitivity and landscape capacity study guided by landscape-led approach). In addition we would ask that there be a requirement to produce a landscape-led masterplan for the site, with LVIA undertaken post design.
- Yes happy with paragraph 4.6.

#### Site assessment comments

General comments:

- I note that in the MSDC assessments section where sites have been ruled out as being in the setting of the National Park, this has been explained as being due to roads or other built

form between the SDNP and the SHELAA site. Setting and roads & built form can be part of the setting of the SDNP e.g. the settlement of Hurstpierpoint is part of the setting of the NP.

- LCA sections would benefit from pulling out comments in the LCA on settlement character and pattern, built form and roads. This will help to inform understanding on how development on these sites may impact this.
- We are pleased to see tranquillity and DNS feature in the assessment of these sites and the use of SDNPA evidence in these assessments. This evidence is a really important starting point but would benefit from some further additional site specific analysis – for example the tranquillity scores are averaged across an area and so give an indication of the relative tranquillity in that area, but are there site specific factors which support or alter this conclusion? The tranquillity report includes key criteria aspects of this could be informed from desktop research or using information gathered from the SHELAA site visit e.g. naturalness of the site.
- The boundary to the SDNP on the SHELAA maps differs on occasion to our mapping – suggest further liaison to clarify this.

#### Site comments:

##### **ID 828**

- The site forms landscape and visual setting of the SDNP
- Access to the site appears to be via the access road to Ridgeview – this road is of rural character with incidental nature, narrow with ditches either side and this is reflect in the road hierarchy. The need for obtrusive highway works, including some in the NP, which would undermine the rural qualities of the NP and access to Ridgeview.
- Impact upon Hopkin’s Crank listed building and it’s important links/relationship to Eric Gill
- Surface water flooding is potential.
- Cumulative impact and furthering the severe erosion/undermining of the setting of the NP around Burgess Hill that has already taken place
- Poor relationship to settlement pattern

##### **ID 19**

- The site is likely to form part of the visual setting of the NP – potential for views from rising land in the south and Wolstonbury Hill.
- Hurstpierpoint is characteristically a linear settlement – and this character is experienced in this part of the setting - Development at depth is uncharacteristic
- Post-medieval origin (the site). Gap here comprises early post-med and medieval landscapes. Gap is important to Mid Sussex landscape and NP setting. See Viewshed Study.
- Site could be wet – surface water flood-risk and slowly permeable wet soils present.

##### **ID 742**

- The site comprises landscape and potentially visual setting of the SDNP.
- Whilst a more recent landscape, the site does not conserve settlement pattern of Hassocks.
- Undermining of the setting – this site functions as a key buffer between built up settlement and the NP
- Clay soils, surface water flood risk

##### **ID 1095**

- Likely to comprise the visual setting to the NP
- Re-development of farm (especially one which is not historic like this) is a good way to conserve settlement pattern. However the site proposed is much larger and such a scale of development is not characteristic to retain the identify as a settlement in its own right and

separation from Hurstpierpoint. To be characteristic it would be the farmstead itself for development.

- As part of the visual setting, development at this scale does not respect the settlement pattern of the area and therefore setting.
- Again this is a wet landscape – adjacent ‘spring farm’ and watercress beds.

#### ID 799

- This site is likely to be visible from the NP and could comprise its visual setting.
- The scale undermines the small-scale dispersed pattern of settlement so critical to the character of the low weald which is within the setting (and beyond).

I do hope the above is helpful for the topic paper. I’m very happy to discuss any thoughts you have or any questions arising – please do let me know.

Kind regards  
Kate

#### **Katharine Stuart**

Planning Policy Lead  
South Downs National Park Authority  
Direct Tel: [REDACTED]

**Please note that we are experiencing a temporary number of vacancies that is impacting some areas of our planning service at the South Downs National Park Authority. We are working actively to recruit new staff and are committed to filling all posts within the Planning Department. We would be grateful for your understanding and patience during this time, as we may be unable to deal with all matters within normal specified timeframes. As always, our goal is to deal with matters as efficiently as possible and we hope to be in a position to meet our normal specified timeframes within 4 to 5 months. Thank you.**

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**From:** Jennifer Hollingum [REDACTED] [uk](#)>

**Sent:** 06 September 2022 12:21

**To:** Lucy Howard [REDACTED]>; Katharine Stuart

[REDACTED]  
[REDACTED]@midsussex.gov.uk>

**Subject: MSDC | Topic Paper - Setting of the SDNP: Assessment of SHELAA Sites**

Caution: This email originates from outside of South Downs National Park Authority and could contain malicious content. Please think very carefully before opening attachments or clicking on links.

Dear Lucy and Kate,

Further to our meeting last week, please find attached the draft topic paper – Setting of the South Downs National Park: Assessment of SHELAA Sites. We are sharing this with you on a confidential basis for your review ahead of its publication alongside other Regulation 18 documents for the District Plan Review. We would welcome any feedback and comments including on both the methodology and the individual assessments. It is a Word document so please feel free to add any tracked changes or comments directly in the document.

We have identified the SHELAA sites that are closest to the South Downs National Park boundary and so which could potentially be regarded as being within the setting of the South Downs National Park, but if you feel other SHELAA sites should be subject to an assessment, please let us know. The SHELAA sites can be found at: <https://www.midsussex.gov.uk/planning-building/strategic-housing-and-economic-land-availability-assessment/>.

If you are able to provide any comments by Monday 19<sup>th</sup> September that would be very much appreciated. If it would be helpful to discuss anything in this draft topic paper, please do let me know and we can arrange a convenient time.

I look forward to hearing from you.

Kind regards,

Jennifer

Jennifer Hollingum  
Senior Planning Officer  
Planning Policy

[REDACTED]  
[www.midsussex.gov.uk](http://www.midsussex.gov.uk)

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**From:** Amy Tyler-Jones <>  
**Sent:** Friday, January 12, 2024 1:49 PM  
**To:** Jennifer Hollingum <>  
**Cc:** Ruth Childs <>  
**Subject:** RE: MSDC District Plan SDNP Background Paper

Hello Jennifer,

Thank you for the opportunity to comment on this background paper. We welcome this assessment of the setting of the SDNP and it's good to see factors such as visual impact, tranquillity, dark night skies, access and GI / ecosystem services included in the assessment. We've got the following overarching observations to make at this stage:

1. The setting of the SDNP is not defined for the purpose of the assessment. Whilst there isn't a definitive line on where the setting extends to, the factors on which you've assessed whether a site is in or not within the setting, should be set out e.g. proximity, intervisibility and shared landscape character traits.
2. Following on from the above – we'd query whether the following sites should have been screened out of the setting assessment:
  - 1105** Land east and west of Malthouse Lane, Burgess Hill – *given the capacity of the site extending BH to the south*
  - 740** Broad location west of Burgess Hill (1400 capacity) – *given the capacity of the site, extending BH to the west*
  - 601** Land at Coombe Farm, London Road, Sayers Common (210 capacity) – *not convinced proximity to the A23 rules this site out as part of the setting*
  - 13** Land west of Kemps, Hurstpierpoint (90 capacity) – *given sites to west & north of this site have been assessed for impact on the setting*
  - 986** Land to the west of Albourne Primary School, Henfield Road, Albourne (125 capacity) – *acknowledge there has been an appeal decision on this site, include further details of which to confirm relationship to setting of SDNP*
3. Finally, how have the Reg 19 allocation policies been impacted by the setting assessment? For example allocation DPSC3 makes no reference to the SDNP despite the assessment concluding "it may form part of the visual setting of the SDNP and should be carefully designed to avoid adverse impacts".

Resourcing has meant we've not been able to provide detailed comments on each site. However, we think we probably can do so by early February and certainly before the close of the Reg 19 consultation on the 23<sup>rd</sup> Feb. If there is still scope to include our comments on this basis, please let me know and I'm happy to chat through the above points.

Many thanks

Amy  
Amy Tyler-Jones MRTPI  
Planning Policy Lead  
South Downs National Park Authority

**Please note I work Monday – Friday 9-3pm**  
**Our latest Planning Newsletter can be read here: [Winter Planning Newsletter](#)**



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**From:** Jennifer Hollingum <>  
**Sent:** Friday, December 8, 2023 2:20 PM  
**To:** Katharine Stuart <>  
**Subject:** MSDC District Plan SDNP Background Paper

Dear Kate,

We have been preparing a background paper to support the Submission Draft District Plan 2021-2039 – Setting of the South Downs National Park: Assessment of the SHELAA sites. Please find the draft background paper attached. We would like to give you the opportunity to review the draft background paper and we would welcome any comments.

You saw and commented on the previous version of the background paper at the Regulation 18 stage; we have taken into account your comments and made changes to the paper. We have also assessed more SHELAA site in this version. This background paper has been drafted in the context that there is not a standard approach to this type of assessment and that it should be read alongside the site selections papers.

I would particularly welcome your thoughts around paragraph 4.10 and whether you would like us to include the SDNPA's comments in the assessment tables.

The SHELAA site maps can be found at: [Strategic Housing and Economic Land Availability Assessment - Mid Sussex District Council](#).

We would be grateful for any comments by **Friday 5<sup>th</sup> January 2024** so that we can finalise this background paper in readiness for the next stage of the District Plan.

Please let me know if you have any questions or if you would like to discuss this further.

Thank you.

Kind regards,

Jennifer

Jennifer Hollingum  
Senior Planning Officer  
Planning Policy

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