

## PROPOSALS TO DEVELOP HAYWARDS HEATH GOLF CLUB

### **INITIAL REVIEW OF THE PLANNING APPLICATION: MAIN CONSIDERATIONS**

Prepared by Enplan for Lindfield Rural Parish Council

1<sup>st</sup> April 2020

### **CONTENTS**

- 1.0 INTRODUCTION
- 2.0 MAIN ISSUES
- 3.0 CONCLUSIONS

### **1.0 INTRODUCTION**

- 1.1 Enplan has been appointed by Lindfield Rural Parish Council to undertake a review of the Outline planning application to develop Haywards Heath Golf Club, to prepare the Parish Council's consultation response and to advise the Parish Council generally. Enplan is a planning and landscape consultancy with considerable experience in preparing applications (including EIA applications) for major development on behalf of applicants and of assessing similar proposals on behalf of local authorities and third parties.
- 1.2 The planning application in Outline (DM/20/0559) concerns proposals to develop the Haywards Heath Golf Club site for up to 725 dwellings (30% affordable), alterations to Beech Lane, provision of public open space, play space, community facilities, retail, pedestrian linkages, landscaping and drainage. All matters are reserved except for access. The application is accompanied by an Environmental Statement.
- 1.3 This paper is an initial review of the planning application in advance of a Parish Council consideration by members. It seeks to headline the main issues that will be relevant to the Parish Council's consultation response that will be prepared over the next few weeks. The response will provide a more detailed analysis of these considerations.

## 2.0 MAIN ISSUES

### *Planning Policy Context and Housing Land Supply*

- 2.1 The Development Plan comprises the Mid Sussex District Plan 2014-2031 (MSDP), adopted 2018, and the Lindfield and Lindfield Rural Neighbourhood Plan 2014-2031. Together with the National Planning Policy Framework (NPPF), these plans and various Supplementary Planning Documents issued by Mid Sussex District Council provide the planning policy context for determining the application.
- 2.2 Adopted in 2018, the MSDP is relatively recent and accordingly provides an up-to-date set of planning policies. For decision-taking purposes this means that the policies of the MSDP, together with the NPPF, should be given significant weight.
- 2.3 The application site lies outside of the defined built-up area boundary for Haywards Heath and Lindfield and is, therefore, part of the countryside for planning consideration purposes and, consequently, paragraphs 8 and 170 of the NPPF and MSDP Policy DP12: Protection and Enhancement of Countryside are particularly relevant. Proposals for a major development outside of the built-up area boundaries are likely to be contrary to development plan.
- 2.4 The District Council currently considers that it has a five-year housing land supply; a matter not disputed by the applicants in the Planning Statement. The applicants view is that the development proposals “*would bolster the Council’s housing land supply position, and in doing so, would accord with the Government’s intention of boosting the supply of housing*”<sup>1</sup>. Whilst the grant of approval would undoubtedly bolster the District Council’s housing numbers, the Government’s requirement is for local planning authorities to supply a minimum and, in our view, the District Council is unlikely to be persuaded to release a large countryside site where this would be contrary to a raft of other policies. Should the District Council not be able to demonstrate sufficient supply at the time of determination then, for applications involving housing, policies which are most important for determining the application may be considered to be out-of-date<sup>2</sup>.

---

<sup>1</sup> Planning Statement paragraph 6.3

<sup>2</sup> NPPF paragraph 11(d)

### *Highways*

- 2.5 We note the Highway Authority (West Sussex CC) raises a number of apparently significant issues with the transport and highway proposals. They identify that the Transport Assessment supporting the application has not been updated since it supported the site's previous promotion through the development plan and they are requesting some significant further information to make good the clear deficiencies in the proposals. Amongst a variety of matters they raise, they highlight that the junctions of the alterations to Beech Lane do not work as proposed and that there has been no consideration of how pedestrians and cyclists would connect appropriately with services at the town centre.
- 2.6 At the present time the Highway Authority is requesting further information, they are not as yet in a position to determine whether they object to the application or otherwise. It is likely that this further information will take a significant period to prepare and it is conceivable, that following further submissions by the applicant, that their concerns can be met.

### *Landscape*

- 2.7 The site is in a countryside location, close to, but not in, or apparently seen from the High Weald AONB or otherwise designated. Accordingly, it is not likely to be considered a '*valued landscape*', in the meaning referred to in the NPPF<sup>3</sup>. Nevertheless, there would inevitably be some levels of harm to landscape character and to the visual amenity of the users of publicly accessible locations, such as the Public Rights of Way network, and potentially adverse effects on the visual amenity of local residents at home. We will undertake further high-level work to determine the extent to which the Landscape and Visual Impact Assessment, contained within the Environmental Statement, can be considered to be reliable.
- 2.8 We note that the District Council's landscape advisor (the County Landscape Architect) objects to the proposals on the grounds that they would be contrary to paragraphs 170 (a) and (b) of the NPPF. As the landscape advisor accepts in her response that the landscape is not a valued landscape, we are not sure how she seeks to engage paragraph 170 (a). She may though have legitimately referred to paragraphs 8 and 170(b), as well as MSDP Policy DP12.

---

<sup>3</sup> NPPF paragraph 170(a)

- 2.9 We also note that the High Weald AONB Unit does not object, as the site is outside the AONB, but does recommend a number of revisions to the current proposals that would move the northern edge of the development back beyond the local ridgeline and away from the AONB. We will consider this proposal and advise as to its likely merits in due course.

### *Ecology*

- 2.10 The ecology and nature conservation assessment, contained within the Environmental Statement (ES), concludes that the existing habitats present on the application site have low nature conservation value and that the predicted impacts from habitat loss would be neutral overall, with the adoption of mitigation measures. The relatively low value of the site is not surprising given it is a well-maintained and relatively compact golf course, without any semi-natural habitats. However, the assessment does recognise that the development has the potential to affect various species, some of which are protected, such as bats, breeding birds, Dormice, Great Crested Newt, reptiles and Hedgehog, although considers that such effects are capable of being mitigated.
- 2.11 Most significantly, the application site in part lies immediately adjacent to Wickham Wood, which is Ancient Semi-Natural Woodland and a Local Wildlife Site. A 15m buffer is proposed along this boundary. This is the minimum guideline buffer with most nature conservation bodies preferring buffers of up to 50m. We will give further consideration to this approach and will confirm conclusions in respect of the location relative to the Ashdown Forest SAC and SPA. We note that Natural England does not object.

### *Other Environmental Topics*

- 2.12 The ES concludes that there would be no significant effects in respect of air quality, noise and vibration, water resources and flood risk, archaeology and cultural heritage and waste. There would be predicted benefits to socio-economic and human health issues. We will make a fuller review of these assessments and their conclusions.

## **3.0 CONCLUSIONS**

- 3.1 This initial review seeks to highlight the key issues and concludes that planning policy, housing land supply, transport and highways, as well as landscape and

possibly ecology, are the areas where the proposals are most likely to generate concerns which may be contrary to planning policy.

- 3.2 It would appear that as the District Council has an up-to-date plan and a five year housing land supply, that it does not need this site at this time, to meet its requirement to deliver current housing targets. Furthermore, as the site lies outside of the built-up area boundary the proposal would appear to be contrary to a number of planning policies, including MSDP Policy DP12, which seeks to protect and enhance the countryside, and to paragraphs 8 and 170 (b) of the NPPF, which seek the protection of the environment and the intrinsic beauty of the countryside. The degree of harm to the landscape/countryside is a matter we will advise on, at a high-level, in due course.
- 3.3 Highways and transport matters will evidently take some considerable time to resolve as the applicant is bound to be required to address the deficiency in the current application. It remains to be seen as to the extent to which the Highway Authority's concerns can be met, but it is conceivable that these can be addressed.