

Objection on behalf of Cocking Parish Council to Regulation 18 South Downs Local Plan Review

Potential housing allocation at Land East of A286 and North of Mill Lane, Cocking (Site Ref. CH199)



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Introduction

The Local Plan Review is being prepared at a time of change for plan-making. For the purpose of preparing this review, the policies in the December 2024 version of the National Planning Policy Framework (NPPF) will apply.

The Regulation 18 Local Plan does not include any discussion about overall housing need figures.

The NPPF states that plans should apply a presumption in favour of sustainable development. This means that all plans should promote a sustainable pattern of development that seek to provide for objectively assessed needs for housing and other uses, unless

- the application of policies in the Framework that protect areas or assets of particular importance (such as National Parks or Conservation Areas) provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
- any adverse impacts of meeting housing need would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

The 2010 Circular for English National Parks and the Broads confirms that national parks are not suitable locations for unrestricted housing and the expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services (paragraph 78).

The Natural Environment Planning Practice Guidance (PPG) says that NPPF policies for protecting national parks may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas. (Paragraph: 041 Reference ID: 8-041-20190721)

The PPG on Housing Need revised in December 2024 states that where strategic policy-making authorities do not align with local authority boundaries (either individually or in combination), or the data required for the model are not available such as in National Parks, a locally determined alternative approach may have to be used taking into consideration the best available evidence on the amount of existing housing stock within their planning authority boundary, local house prices, earnings and housing affordability. (Paragraph: 014 Reference ID: 2a-014-20241212).

The Government has stated its intention to reintroduce strategic planning through new primary legislation, and a number of groupings are starting to emerge of County, Unitary and District/Borough Councils interested in working together on devolution proposals, including potentially strategic planning.

In summary, even with the objective of significantly boosting housing supply, national parks are afforded the highest landscape status and protection and remain exempt from meeting identified housing need within their boundaries. For this reason, there is no justification for allocating unsuitable housing sites within the South Downs National Park Local Plan Review.

Objection

The Parish Council strongly object to the potential housing allocation at Land East of A286 and North of Mill Lane, Cocking. The site is not:

Justified (an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence) or

Consistent with national policy (enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant).

The evidence to support this objection is set out in the following sections.

Landscape Impact

The potential allocation would result in significant new built development on a prominent, elevated greenfield site at the foot of the Buriton to Arun Scarp within the South Downs National Park.

Planning Policy Context

NPPF

The updated NPPF does not weaken the protections for the South Downs National Park. The National Park is still afforded the highest landscape status, with great weight given to conserving and enhancing landscape and scenic beauty, conservation and enhancement of wildlife and cultural heritage, and the scale and extent of development should be limited.

Levelling-up and Regeneration Act 2023

The statutory purposes of National Parks are:

- conserving and enhancing the natural beauty, wildlife and cultural heritage of the areas designated
- promoting opportunities for the understanding and enjoyment of the special qualities of those areas by the public

Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 replaces the previous duty on the South Downs National Park Authority to 'have regard to' the statutory purposes of National Parks with the duty to 'seek to further' these statutory purposes in the preparation of Development Plans and associated assessments and documents. The revised duty is intended to facilitate better outcomes for England's Protected Landscapes in reaching decisions and undertaking activities that impact these areas.

In accordance with Government Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes, 2024, the duty is a proactive duty which means relevant

authorities should seek to avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes.

Local Plan Review

Strategic Policy SD25: Development Strategy of the Local Plan Review states that the principle of development within Cocking is supported provided that development:

a) Is of a scale and nature appropriate to the character and function of the settlement in its landscape context... and

c) Makes efficient and appropriate use of land.

Strategic Policy SD4: Landscape Character of the Local Plan Review states:

1. Development proposals will only be permitted where they conserve and enhance landscape character by demonstrating that:

a) They are informed by landscape character, reflecting the context and type of landscape in which the development is located;

b) The design, layout and scale and use of proposals conserve and enhance existing landscape ... character of the site and its context which contribute to the distinctive character, pattern of elements and evolution of the landscape;

c) They will safeguard the experiential and amenity qualities of the landscape...

3. The settlement pattern and individual identity of settlements ... will not be undermined.

The potential allocation site falls within Landscape Character Area K Greensand Terrace within the **South Downs Landscape Character Assessment, 2020**.

The key Landscape Characteristics identified for this area which should inform the selection of allocation sites include:

■ *A distinct terrace formed from Upper Greensand with a locally prominent escarpment defining its outer edge.*

■ *Cut by a series of small streams that rise from springs near the foot of the chalk escarpment, and have eroded narrow, deep valleys as they cross the Upper Greensand shelf.*

■ *Distinctive hanger woodlands, remnants of ancient woodland, cling to the steepest slopes.*

■ *Dominated by the adjacent steep chalk escarpment, from which there are panoramic views over the Greensand Terrace. There are also views over the adjacent lowlands from the edge of the type.*

On Settlement Form and Built Character, the Landscape Character Assessment notes that modern settlement is limited and largely unobtrusive, consisting of piecemeal infill on the margins of the nucleated villages.

The Landscape Character Assessment states that the overall management objective should be to conserve the intimate scale and secluded rural and tranquil character of the landscape,

derived from its ancient hanger woodlands, interconnected pattern of enclosed pastures, sunken lanes, and small rural villages.

The Guidance for Integrating Development into the Landscape which should inform the selection of allocation sites requires proposals to:

A. Conserve the nucleated form and rural character of the villages and maintain the low level of dispersed settlement.

E. Conserve the rural character of the landscape ... and associated dark skies.

Within the Greensand Terrace Landscape Character Area, the site is located at the northern edge of Landscape Character Sub-Area K2 East Meon to Bury Greensand Terrace.

The East Meon to Bury Greensand Terrace character area is a distinctive broad Upper Greensand 'terrace' occurring at the southern edge of the Greensand and the Weald. Its southern boundary is marked by the steeply rising chalk escarpment of the Buriton to Arun Scarp.

The key landscape characteristics identified include:

■ *A terrace formed from Upper Greensand with a locally prominent northern escarpment clothed in woodland along part of its length.*

■ *Cut by a number of narrow, steep sided valleys formed by small streams that rise from springs at the foot of the chalk escarpment and flow northwards towards the River Rother.*

■ *Dammed mill ponds and ornamental ponds are features of the ravine like valleys.*

■ *Occasional woodlands and a well-developed hedgerow network provide valuable ecological features.*

■ *A strong sense of rural tranquillity resulting from the absence of overt human impact and a low density of settlement.*

■ *Low density of settlement is characterised by small nucleated medieval settlements comprising farmsteads clustered around a church.*

■ *Building materials are typically local 'Malmstone', with red and yellow brick detailing, and clay tile roofs.*

■ *Dramatic views of the chalk escarpment and from the edge of the terrace over the Rother valley to the north.*

In addition to the generic landscape management and development considerations for this landscape type, the following landscape management consideration should inform the selection of allocation sites:

f. Conserve the dramatic views of the chalk escarpment ...

The following development considerations are specific to this character area:

a. Ensure that any proposals for built development respect the settlement pattern that is characterised by nucleated villages with an extremely low level of dispersed development.

b. Consider the impact of change on views of the scarp from this area, as well as from the edge of the terrace to the north over the Rother valley.

Landscape Impact

The potential allocation site forms part of the designated South Downs National Park. The site has a strong connection with the wider National Park landscape. Moving the site boundary from that proposed by the site owner to an arbitrary line where there is no natural northern boundary which subdivides the site from the remainder of the Rother valley to the north means the potential allocation would inevitably be exposed in views at this prominent location.

The handful of low density dwellings at the foot of the escarpment to the south is imperceptible even in winter leading to uninterrupted views of the scarp slope. This area is correctly not included within the defined Settlement Boundary of the adopted Local Plan given there is very limited dispersed development present in this area. There is a strong perception of the absence of development to the west of the A286 on this approach to Cocking.



Dramatic uninterrupted views of the Cocking downs chalk escarpment cited by the Landscape Character Area



Dramatic uninterrupted views of the Cocking downs chalk escarpment cited by the Landscape Character Area



Strong perception of the absence of development to the west of the A286 on this approach to Cocking

The potential greenfield site sits within the South Downs National Park

The site is in good condition and provides an uninterrupted setting from the A286 of the important distinctive features which combine to create this and the adjoining landscape character area - particularly the steep chalk escarpment, the hanger woodland with remnants of ancient woodland and the narrow, steep sided wooded valley formed by Costers Brook that rises from a spring at the foot of the chalk escarpment, and a sense of rural tranquillity. The Landscape Character Assessment recognises the importance of conserving the dramatic views of the chalk escarpment.

Whilst having no public right of way to allow direct access, the site forms part of recognised and key views from the South Downs Way as well as Public Footpath No 946 (see Impact on Key Views below) and the A286.

The site also plays an important role in the setting of the Cocking Conservation Area (see Heritage Impact below).

For these reasons the site has High Landscape Sensitivity (as confirmed in the South Downs Land Availability Assessment, 2024).

The construction of 25 dwellings in this landscape of high sensitivity would introduce significant built form into an area where no development is currently perceived. The site is extensive in scale relative to the village. It should be noted that the South Downs Land Availability Assessment, 2024, notes that an area of approximately 1.5ha would be suitable for housing development whereas the potential allocation Land East of A286 and North of Mill Lane, Cocking states that the Gross Site Area is 2.6ha, confirming it is out of scale with even the Local Planning Authority's assessment.

The presence of 25 dwellings would inevitably introduce new activity and lighting into this tranquil and dark sky setting of the escarpment. The site rises towards the south, so increasing the visual impact. There is no mature tree or woodland northern boundary to mitigate the impact of development and the introduction of such a feature would in any event be inappropriate as it would interrupt the characteristic dramatic views of the escarpment.

Vehicular access to the site would be directly from the A286. In order to achieve a more level access, the site has had to be elongated northwards - creating a more extensive site. Otherwise the natural gradient of the bank would need to be excavated to overcome the change in level between the road and the site. An out of scale urban, engineered access point and cul de sac entrance and visibility splay would result in the removal of mature and prominent trees, hedge and bank at this prominent gateway to the village. Signage, road markings and lighting would further urbanise this wide new entrance and cul de sac. Any street lighting would significantly detract from the rural character and dark skies. The proposed access road inappropriately extends the site northwards and/or would significantly erode the verdant and rural character of this village gateway.



The high bank and associated tree lined avenue and hedge boundary to the east of the A286.



The extensive potential allocation site looking north across the Rother Valley landscape with no natural boundaries

The potential allocation site would protrude north-eastwards into open countryside. The scale and nature of the potential allocation would not conserve and enhance the existing landscape character of the site and its context which contribute to the identified distinctive character, pattern of landscape features and evolution of the landscape and would therefore not comply with Policy SD25 of the Local Plan Review.

The proposal would not conserve the nucleated form and rural character of the village and maintain the low level of dispersed settlement, conserve the rural character of the landscape and associated dark skies, or conserve the dramatic views of the chalk escarpment as required by the Landscape Character Assessment Guidance for Integrating Development into the Landscape and Policy SD4.

The potential allocation site would not safeguard the experiential and amenity qualities of the landscape particularly from the A286, the South Downs Way and Public Footpath No 946 (see Impact on Key Views, below) and would therefore not comply with Policy SD4 of the Local Plan Review.

Overall, the development proposals would not conserve and enhance the landscape and scenic beauty of this sensitive landscape within the South Downs National Park and would not comply with the NPPF or Policies SD4, SD8 and SD25 of the Local Plan Review.

The absence of any natural boundary to the wide northern edge of this potential allocation would result in a major adverse impact on this landscape of High Sensitivity.

Sites CH170 and CH200 of the Land Availability Assessment are rejected by the Local Planning Authority on landscape grounds due to the open and extensive visibility of the sites, the poor relationship with the settlement pattern and intrusion into the surrounding rural landscape. More detailed analysis of the potential allocation CH199 indicates that this site would also have such impacts on the landscape and is therefore unsuitable for allocation.

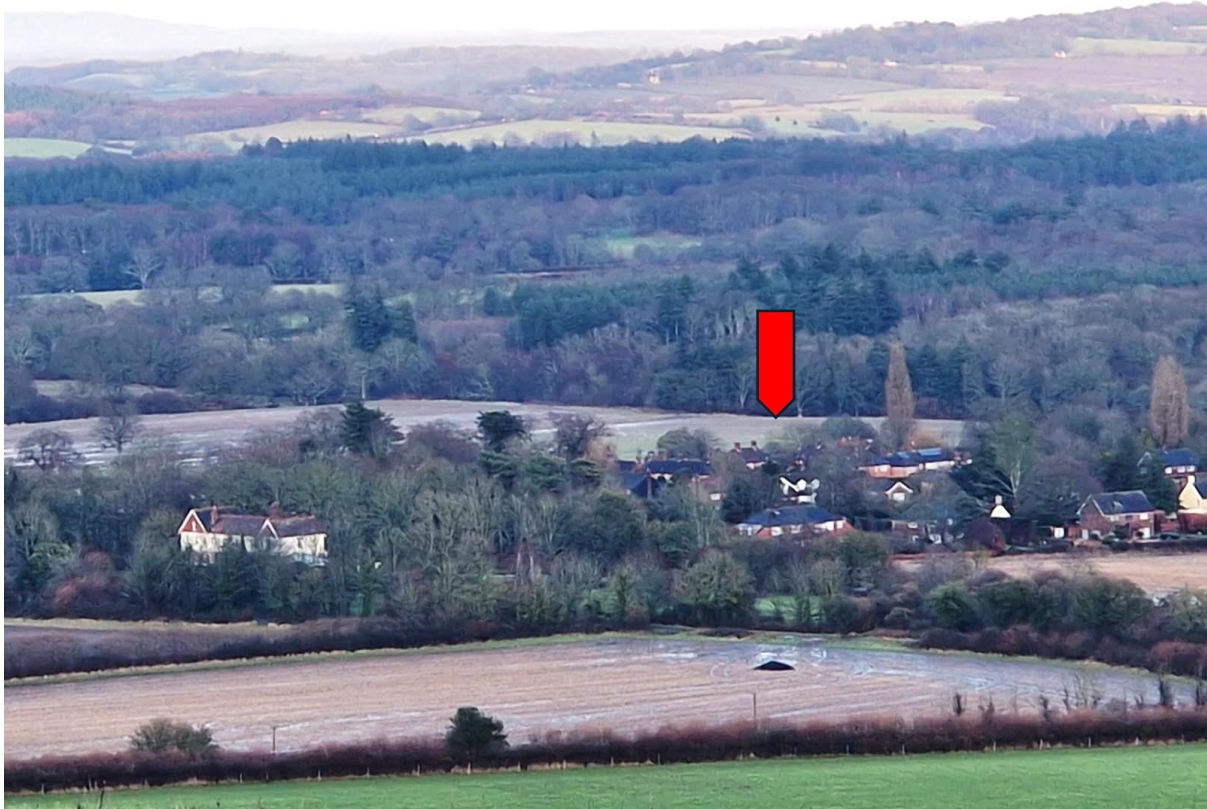
Impact on Key Views

View 38 from Cocking Down on the South Downs Way

The potential allocation site is highly visible from one of the key views identified within the South Downs National Park: View Characterisation and Analysis. View 38 is from Cocking Down on the South Downs Way long distance footpath.



The extensive potential allocation site to the north-east of Cocking from View 38, Cocking Down, on the South Downs Way long distance footpath



The extensive potential allocation site from View 38, Cocking Down, on the South Downs Way long distance footpath

The analysis states that this viewpoint is a natural vantage point from which to appreciate elevated views over the Rother Valley. It is located on the South Downs Way and views from the top of the Down are noted in the literature for the South Downs Way.

The analysis identifies the special qualities of this view:

The elevated position on the scarp means this view type represents the ‘breathtaking views’ that are noted in the first of the Park’s special qualities. It also reveals a rich variety of wildlife and habitats (the second of the Park’s special qualities) including some of the iconic habitats of the South Downs such as the sheep-grazed downland, woodland (including beech forests on the scarp) and heathland. It also reveals the tranquillity of the downs, as a result of the lack of intrusive development and sense of space, which is another of the special qualities of the landscape. It also reveals the way that farming has shaped the landscape (through the field patterns and contrast between enclosed farmland in the valley and unenclosed sheep grazed downs or woodland on the scarp), and the distinctive settlement pattern of settled valleys and spring line villages at the foot of the scarp. (Para. 3.7)

The View Characterisation and Analysis identifies potential threats to this view:

Threats to this view type could result from developments that affect the iconic habitats, disrupt field patterns, change the distinctive settlement pattern of small historic villages, or form intrusive new developments within the view either by day or night. (Para. 3.8)

The Aim & Management Guidance states:

The aim is to ensure that there remain opportunities to access and appreciate these panoramic views, and to ensure the special qualities recorded above are retained. In particular, it will be important to:

- *Maintain the settlement pattern of small settlements nestled within the valley and at the scarp foot, amongst trees.*
- *Maintain the undeveloped character of the downs and greensand hills, particularly their scarps and skylines, and maintain the traditional settlement pattern of villages along the valley and scarp foot.*
- *Ensure that development within the valley is integrated into its rural landscape context, fitting with the scale and character of the rural villages and using local building materials.*

One of the Key Landscape Sensitivities of the Rother Valley to the north (which sits within the Type L: Mixed Farmland and Woodland Vales Landscape Character Area) is identified as:

Views of the area from viewpoints in the adjacent Greensand Terrace and as well the chalk landscapes beyond, including those identified as representative in the View Characterisation and Analysis report.

The extensive potential allocation site is prominent in View 38 from Cocking Down. The open field provides the contrast to the enclosed woodland to the east, the tree lined A286 to the west and the landscape setting of the village to the south. This is highly characteristic of the Rother Valley Landscape Character Type L: Mixed Farmland and Woodland Vales with *'arable agriculture, interspersed with permanent pasture grassland and frequent woodland creating a mosaic of mixed farmland and woodland'*.

The old railway Station House off Bell Lane is prominent in the foreground but Cocking nestles unobtrusively at the foot of the escarpment, and the village retains the distinctive nucleated settlement pattern of settled valley- and spring-line villages at the foot of the scarp.

The potential allocation would have a significant adverse impact on views from the South Downs Way (including identified View 38). The extensive open site is an important element in the mosaic of mixed farmland and woodland typical of the character area and would be lost to built development, road access, lighting and activity associated with a new housing estate.

The extensive potential development site is situated on raised land and would be viewed from an elevated position and would result in intrusive new development within the view by day or night.

Development of the site would significantly extend and change the distinctive settlement pattern of this small historic village when viewed aerially from the South Downs Way.

Public Footpath No 946

Public Footpath No 946 extends northwards from Mill Lane to the east of Mill Hanger with partial views of the potential development site to the west. The site provides the open and contrasting setting for this ancient woodland which is a designated Local Wildlife Site. Development of this extensive site would adversely affect the views from this footpath which relate to this biodiversity feature.



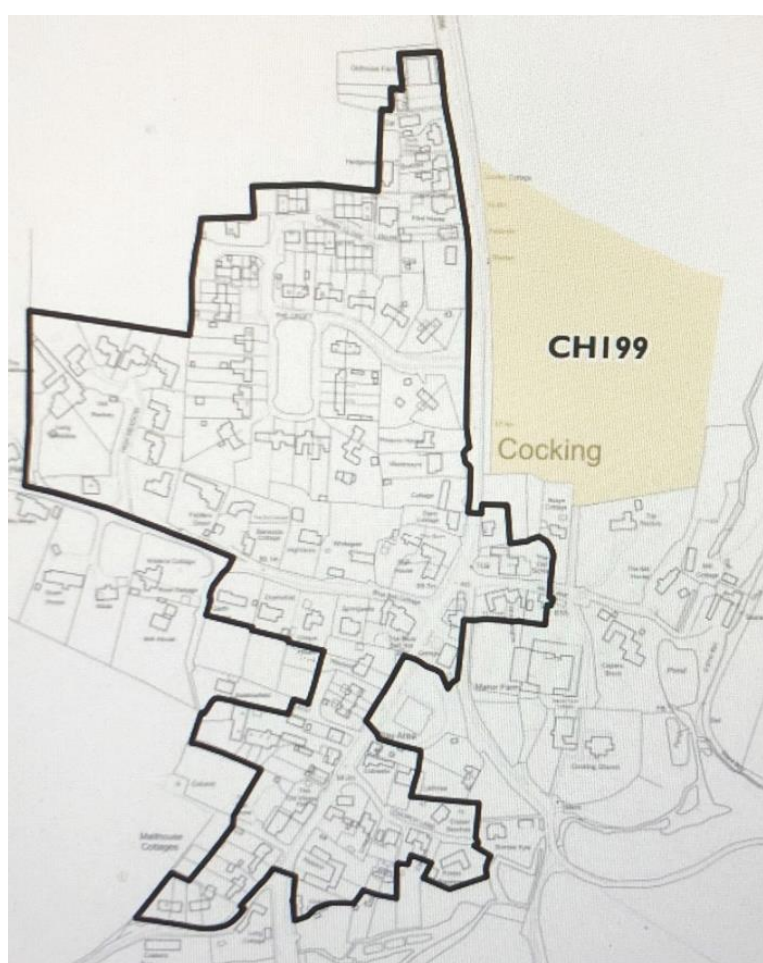
Views of the potential allocation from Public Footpath 946



In conclusion, development of the site would not conserve and enhance key views within the National Park, including the well-used South Downs Way, and would adversely affect the views from Public Footpath 986 which relate to the Hoe Copse Local Wildlife Site. The proposal would therefore be contrary to Strategic Policy SD6: Safeguarding Views of the Local Plan Review.

Impact on the Settlement Pattern

The statement in the Land Availability Appraisal that the potential allocation site is 'well related to the nucleated settlement pattern' appears to ignore the Settlement Boundary as defined in the adopted Local Plan.



The potential allocation site in relation to the Settlement Boundary

Whilst there is very limited low-density historic development to the east of the existing settlement boundary around Mill Lane, this area is correctly excluded from the Settlement Boundary given its dispersed rural character.

The proposal clearly does not represent 'infill' development or 'rounding off'. There is currently no perception of development to the west of the A286 when looking into the site at the northern gateway to the village. The potential allocation protrudes north-eastwards from the Settlement Boundary and would appear as an incongruous 'bolt on' development.

The potential site represents a very large extension to a small nucleated settlement, adding some 20 -25% to the land area within the Settlement Boundary in a single allocation. The scale and location of the potential site are not appropriate to the character and function of the settlement in its landscape context.

On Settlement Form and Built Character, the Landscape Character Assessment notes that modern settlement is limited and largely unobtrusive, consisting of piecemeal infill on the margins of the nucleated villages.

The impact of this protruding development on the settlement pattern would be exaggerated by the rising topography of the site, the absence of a natural northern boundary to the site and the visual impact on the nucleated settlement form when viewed from Cocking Down on the South Downs Way long distance footpath (View 38).

Cocking nestles unobtrusively at the foot of the escarpment, and the village retains its distinctive nucleated settlement pattern of settled valley- and spring-line village in common with others at the foot of the scarp.

The South Downs Landscape Character Assessment analysis identifies one of the special qualities of this view as *...the distinctive settlement pattern of settled valleys and spring line villages at the foot of the scarp. Threats to this view type could result from developments that ... change the distinctive settlement pattern of small historic villages, or form intrusive new developments within the view either by day or night.* (Paras. 3.7 and 3.8)

The South Downs Landscape Character Assessment Aim & Management Guidance states: *...it will be important to:*

- *Maintain the settlement pattern of small settlements nestled within the valley and at the scarp foot, amongst trees.*

The Landscape Character Assessment Guidance for the Greensand Terrace Character Area requires proposals to:

A. Conserve the nucleated form and rural character of the villages and maintain the low level of dispersed settlement.

The following development consideration is specific to the East Meon to Bury Greensand Terrace character area:

a. Ensure that any proposals for built development respect the settlement pattern that is characterised by nucleated villages with an extremely low level of dispersed development.

Strategic Policy SD25: Development Strategy of the Local Plan Review states:

1. The principle of development within the following settlements, as defined on the Policies Map, will be supported, provided that development:*

a) Is of a scale and nature appropriate to the character and function of the settlement in its landscape context...

The extensive potential allocation site would protrude north-eastwards into open countryside and be completely out of scale and character with the settlement pattern. Consequently, the site would not comply with either the Landscape Character Assessment Guidance or Policy SD25 of the Local Plan Review.

In addition, this analysis shows that the potential allocation would have a significant adverse impact on the Character of Settlements and rural buildings sustainability objective.

Heritage Impact

The potential allocation abuts the Cocking Conservation Area and is within the setting of a number of listed buildings.

The scale of the site means that it would impact two separate character areas within the Conservation Area.

Northern Linear Development

The western boundary of the potential allocation site abuts linear, generally two storey development at road level, including converted low rise agricultural buildings which mark the northern edge of the Conservation Area. The linear development is punctuated by a modern cul de sac development which is incongruous within the historic linear settlement pattern at this northern edge of the village and is excluded from the Conservation Area.



Linear development abutting the A286

The historic linear development sits opposite an open field, with a hedgerow and avenue of trees fronting the street atop a rising embankment, providing an undeveloped rural setting for the Conservation Area. There is a strong perception of the absence of development to the west of the A286 on this approach to Cocking.



Hedgerow and avenue of trees along embankment lining the A286

The scale of the potential allocation means that it extends over 200m along the road frontage opposite the historic linear development. The proposal is for a cul de sac development served by a single vehicular access directly onto the A286, opening up a new

street perpendicular to the historic street pattern of this part of the Conservation Area. The proposal would result in a new street located immediately opposite the historic linear development fronting the principal route. The potential allocation would result in the creation of an uncharacteristic form of development in close proximity to the linear edge of the village which would significantly detract from the historic and architectural interest of the Conservation Area and its rural setting.

The proposed vehicular access to the site would either have to be at the northern edge of the potential site in order to achieve a more level access, or would be north or south of The Croft to create a suitable staggered junction with excavation of the bank to overcome the change in level between the A286 and the site. A new road with its bell mouth, footpath(s), visibility splays, signage and lighting towards the northern edge of the potential allocation would be extremely exposed visually and form a dominant new urban feature opposite the historic linear development. A new road further south would require engineering works to overcome the natural gradient of the bank with the loss of a significant number of trees and hedgerow in order to provide the necessary bell mouth entrance, engineering cut and visibility splays. Both options would significantly detract from the historic and architectural interest of the Conservation Area and its setting.

The potential new development would lead to substantial harm to this part of the Cocking Conservation Area.

Historic Core

Cocking is a village set along the springline at the foot of the scarp.

The medieval settlement pattern reflects and developed that of earlier centuries, forming a nucleated settlement comprising farmsteads clustered around a church and set within an area of open fields, primarily farmed communally, with parishes stretching from river valley up onto chalkland.



The historic core of Cocking is clustered around the spring, artificially dammed mill ponds and mill. The Grade 1 St Catherine's of Siena Parish church dates from the C12 and C14 whilst the Grade 2 Manor Farmhouse dates from the C15. The Grade 2 Mill House (left) dates from the C18. Buildings are constructed from local 'Malmstone', with red and yellow brick detailing, and clay tile roofs. Being within the valley, the historic core is low lying.



Two detached dwellings (The Rectory and Braye Cottage) are set in extensive landscaped grounds along Mill Lane.

Braye Cottage, Mill Lane

This part of the historic core has a strong, unified historic character which has experienced very little change.

Historic England's The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) makes it clear that the contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting.

The Good Practice Advice also states:

Understanding this history of change will help to determine how further development within the asset's setting is likely to affect the contribution made by setting to the significance of the heritage asset. Settings of heritage assets which closely resemble the setting at the time the asset was constructed or formed are likely to contribute particularly strongly to significance...

The proposed allocation site abuts the relatively unchanged historic core of the village to the north and rises significantly above this area.



Development would sit on top of the high bank above Costers Brook and the historic core of the Conservation Area (left of photograph)

The limited and relatively unchanged origins of the village are highly representative of the original medieval core of the spring line villages at the foot of the scarp and provide a clear understanding of the evolution of the village and consequently contribute particularly strongly to the historic and aesthetic significance of the Conservation Area.

The potential allocation site would significantly change the historic settlement layout and its relationship to established landscape setting. By virtue of its scale and height and the presence of 25 new dwellings, new development would dominate the low key, lower-lying historic core and completely change its setting.

The potential new development would lead to substantial harm to this part of the Cocking Conservation Area.

The NPPF states:

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (Para. 212).

Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss (Para. 214).

It may be argued that the provision of 25 dwellings provides public benefit, but in the context of a wide range of sites for development being available and in the light of not having to meet identified housing need within the National Park, it is difficult to claim that such a development would achieve substantial public benefits that outweighs the substantial harm to the historic and aesthetic significance of the Cocking Conservation Area.

The potential allocation site would not respect the historic settlement layout or its relationship with the established landscape setting. The site and its proposed access would also significantly harm the views into and out of the conservation area at its northern gateway and from the South Downs Way and Public Footpath 946. For these reasons the potential allocation would not comply with Development Management Policy SD15: Conservation Areas of the Local Plan Review.

Listed Buildings

The potential site allocation would impact the setting of a number of listed buildings.

Manor Lodge

The setting for the Grade 2 Manor Lodge is open fields to the east. Built development of 25 units would cause substantial harm to the setting of this C17 or earlier timber-framed building. Any vehicular access to the potential site would introduce new urban feature in close proximity to this listed building.



Manor Lodge

Mill Cottage and The Mill House



Mill House



Costers Brook

Mill Cottage (formerly Cocking Mill) and The Mill House are both C18 Grade 2 listed buildings. The tranquil setting for Mill Cottage and Mill House is the babbling Costers Brook and associated valley side vegetation. There is an absence of new development in this area as it lies outside the Settlement Boundary.

Development at the potential development site would sit on top of the high bank above Costers Brook and adversely affect the setting of these two listed buildings.

The substantial harm to the setting of these listed buildings which would be caused by the potential allocation is not in compliance with the NPPF or Development Management Policy SD13: Listed Buildings adjoining the potential site of the Local Plan Review.

Even if it is judged that the potential development proposal would lead to less than substantial harm to the significance of a designated heritage asset, as argued previously, it is difficult to claim that such a development would achieve substantial public benefits that outweigh that harm to these heritage assets.

Impact on Biodiversity

Hoe Copse is located to the east of the potential allocation site and comprises a large ancient woodland site, part of which is semi-natural and part plantation on an ancient woodland site. The network of wide, grassy rides has a diverse flora. Costers Brook runs along the western side of the woodland.

The Copse contains areas of conifer and oak *Quercus robur* plantation as well as semi-natural oak and birch *Betula* spp. woodland with hazel *Corylus avellana* coppice. Ash *Fraxinus excelsior* and field maple *Acer campestre* occur in places, especially along Costers Brook in the west of the site. The ground flora is varied and more than 30 ancient woodland indicator species have been recorded, including, betony *Stachys officinalis*, wood speedwell *Veronica Montana*, sweet woodruff *Galium odoratum*, wood sorrel *Oxalis acetosella*, wood spurge *Euphorbia amygdaloides* and opposite-leaved golden-saxifrage *Chrysosplenium oppositifolium*.

Chalk stream habitats are rare. The western chalk stream valley around Costers Brook adjoins the potential allocation site and has some especially diverse areas of wet, alder woodland where thin-spiked wood sedge *Carex strigosa* is locally frequent.

A report on a visit to Costers Brook by Dr Nick Giles in 2002 reports on the condition of the Brook from source to West Lavington. He reports: *Overall, the brook is around 4-5km long and is accessed each autumn by sea trout returning to spawn. Prior to November 2000 the brook was a clear watered, gravel- bedded, weedy stream with a population of young wild trout. The ecological quality of this spring-fed stream was excellent.*

Local observations indicate that the water quality of the Brook appears to remain good throughout the year with no turbidity during higher flows in the winter months and no algal bloom during periods of low flow in the summer months.

The Environment Agency has published data for Costers Brook at Cocking for the 50 year period from 1973 to 2023. Mean flow rate during this period was 66l/sec with a maximum flow of 178l/sec and min flow of 15l/sec. Surface drainage from the potential allocation site could alter this balance during increasing periods of heavy rainfall whereby there could be a risk that surface drains overflow into the Brook. Part of the site falls within Flood Zone 3 and frequently suffers from surface water flooding. In addition, the Cocking sewage treatment plant could become overloaded, discharging untreated sewage directly into the Brook further downstream. Both cases would lead to a severe degradation of the water quality of the Brook. The potential impacts on the water quality, quantity and experiential qualities of the brook identified in the Land Availability Assessment for potential site CH200 apply equally to the objection site.

Site CH200 of the Land Availability Assessment is rejected by the Local Planning Authority partially due to potential impacts on the water quantity, quality and experiential qualities of the brook. Similar considerations concerning the impact on Costers Brook apply to potential allocation CH199 but are inexplicably not included in the Land Availability Assessment.

Mill Hanger in the south- west of the Local Wildlife Site (LWS) is closest to the potential allocation site and is largely semi-natural hazel coppice with oak and ash that lies on a northwest-facing slope. It has a rich ground flora with a variety of ancient woodland ground flora species including bluebell *Hyacinthoides non-scripta*, yellow archangel *Lamiastrum galeobdolon*, wood anemone *Anemone nemorosa*, moschatel *Adoxa moschatellina* and pignut *Conopodium majus*.

The LWS citation states that Costers Brook and Hoe Copse form an important bat corridor. The Sussex Bat Group consider both are likely to provide 'Functionally-linked' habitat, including roosting potential and a flightline for bats commuting and foraging to and from the Singleton and Cocking Tunnels Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) located 870m to the south east.

A well used deer path runs the length of the site and any development would impact on deer habitat connectivity.

Due to the proximity and habitat connectivity to the Hoe Copse LWS which supports ancient and broadly classified deciduous woodland, indirect effects as a result of the proposed development, such as increased noise, lighting and disturbance from recreational pressure and public usage of the LWS could degrade the suitability of the LWS to support bats and protected and notable plant species.

No HRA or Phase 1 Habitat Survey biodiversity impact assessment has been undertaken to understand the direct impact of new development on the ancient woodland, the bat population, plant species or the Costers Brook chalk stream or the indirect impact caused by increased recreational disturbance, noise, pollution and lighting for this potential allocation. There is insufficient evidence to demonstrate that the proposal would not result in the net loss of biodiversity at or adjoining the potential allocation site or that it would result in a net biodiversity gain.

Sustainability of Settlement

The Settlement Facilities Assessment, 2024 illustrates the presence of facilities within settlements to support development. The overall aim of the Assessment is to identify the relative sustainability of settlements.

The Assessment observes that Cocking is not served by key facilities such as a nursery, primary school, GP surgery, supermarket or sports pitches which are accessible within 20 minutes by walking or cycling via an active travel route. Cocking Post Office officially closed on 18 March 2024 on a permanent basis (and the Assessment should be updated to reflect this). The public house was temporarily closed and there remains concern about its future viability. Local employment is very limited with major centres some distance away.

There is a limited bus service.

The village does not now have a basic range of facilities to provide even day to day services such as a PO or primary school. The low score achieved by Cocking in the Assessment (which needs to be updated as a result of the recent loss of facilities) provides, as the report notes, an indication of the declining sustainability of the settlement.

The potential allocation site would result in future residents experiencing difficulties accessing services and facilities if they did not have access to a car.

One of the principal planning tools in mitigating climate change is to actively manage patterns of growth. The NPPF confirms the need for development to be located in sustainable locations in order to help reduce greenhouse gas emissions through the opportunity to reduce the use of the car (Paras. 110 and 164). As the impact of climate change increases, the fact that this is a rural location should not be seen as a reason for the site not being accessible to key day to day facilities. Indeed, the absence of a range of sustainable transport options for all users is an important factor in demonstrating that Cocking is no longer suitable for the addition of a large housing allocation of 25 dwellings.

Sustainability of Potential Allocation (Site CH199)

The NPPF identifies three types of overarching sustainability objectives (economic, social and environmental) which are interdependent and need to be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each of the different objectives (Para. 8).

The following section reviews the balance of sustainability arguments and clearly demonstrates that the potential housing allocation would not represent sustainable development.

Economic Objectives

The economic benefits would be short term (through employment during the construction phase) and very minor in relation to any economic benefits to local businesses given the lack of local services. An additional 25 dwellings would not bring about the re-opening of the Post Office or be likely to represent the difference between the public house remaining open.

Such minor economic benefits must be balanced against the economic disbenefits caused by the permanent loss of economically viable and productive farmland.

Social Objectives

There would be a minor social benefit in developing 25 dwellings, relative to the total number of dwellings proposed to be allocated in the Local Plan Review.

Environmental Objectives

The NPPF's stated environmental objective is protecting and enhancing our natural, built and historic environment; including making effective use of land; helping to improve biodiversity and mitigating climate change (Para. 8). The impact of the potential housing allocation on each of these is reviewed in turn.

Protecting and enhancing our natural environment

Great weight should be given to conserving and enhancing landscape and scenic beauty in the South Downs National Park. As the proposal would fail to conserve the landscape and scenic beauty of the National Park by virtue of its location, scale, access and impact on key views, there is clear conflict with the Framework. The potential allocation would have a significant adverse impact on the landscape and scenic beauty as shown in the Integrated Impact Assessment.

Protecting and enhancing our historic environment

Great weight should be given to the conservation of an historic asset irrespective of whether any potential harm amounts to less than substantial harm to its significance. In this case the potential housing allocation would lead to substantial harm to the significance of Cocking Conservation Area and a number of listed buildings. This high level of harm to the Conservation Area and its setting should be given great weight and is not outweighed by the minimal economic and social benefits set out above. The potential allocation would have a

significant adverse impact on the Protecting Heritage Assets and their Setting and the Character of Settlement sustainability objectives.

Helping to improve biodiversity

The conservation and enhancement of wildlife should be given great weight in National Parks. There is insufficient evidence to demonstrate that the proposal would not result in the net loss of biodiversity at or adjoining the potential allocation site or that it would result in a net biodiversity gain.

Making effective use of land

The potential allocation site is an entirely greenfield site. The NPPF states that planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes (Para. 125) and such weight cannot be added into the balance of whether this potential allocation represents sustainable development. Indeed, the proposal would result in the loss of 2.5ha of productive agricultural land. The proposed density of development of 10 dwellings per hectare represents a profligate use of greenfield land.

Mitigating climate change and sustainable transport

One of the principal planning tools in mitigating climate change is to actively manage patterns of growth. The NPPF confirms the need for development to be sited in sustainable locations in order to help reduce greenhouse gas emissions through the opportunity to reduce the use of the car.

Cocking now lacks even the basic facilities to meet day to day needs, is distant from essential services and lacks suitable sustainable modes of transport to such facilities. Since its classification in the Settlement Facilities Assessment, Cocking has lost its post office.

Future residents could not provide any meaningful support to the provision of local facilities and services. Instead, they would depend on those which are further afield and would be almost entirely reliant on access to a car to reach them. Locating additional residential development on the potential allocation site would be contrary to the Framework's objective of locating housing in rural areas where it will enhance or maintain the vitality of rural communities. The potential allocation would have a likely adverse effect on the Climate Change sustainability objective.

In summary, it is clear that the proposal is contrary to a wide range of environmental objectives, including those given substantial weight by the Framework.

Changes required to South Downs Local Plan Review

As the potential housing allocation at Land East of A286 and North of Mill Lane, Cocking (Site Ref. CH199) is not justified or consistent with national policy, Cocking Parish Council seek the deletion of the potential allocation from the Regulation 19 Local Plan Review.