



# Rottingdean Parish Council

Clerk: James Simister, 42 Bates Road, Brighton BN1 6PG – telephone 07722 462 697

Thursday 4<sup>th</sup> September 2014

Ms Jeanette Walsh,  
Head of Development Control,  
Planning and Public Protection,  
Brighton & Hove City Council,  
Hove Town Hall, Norton Road,  
Hove, BN3 3BQ

Dear Ms Walsh,

## **Planning Application BH2014/02589 – Land south of Ovingdean Rd. Ovingdean**

Thank you for your letter of 18 August 2014. Rottingdean Parish Council has studied the above planning application and has resolved to object on the following grounds.

The Parish Council also noted that the applicant's description of the site, as above, is that it is in Ovingdean. The field in question is in fact in the Parish of Rottingdean and therefore much of the data included in the accompanying documentation needs to be refocused on the needs of Rottingdean and not of Ovingdean or the City in general.

### **Brighton and Hove Development Plan**

Sections 5 and 6 refer to the Brighton and Hove Development Plan and suggest that only limited weight can be given to this plan at present. The applicant seeks to take advantage of the current policy vacuum to push through a development which is not required within Rottingdean Parish. As the site is in Rottingdean any development must fit in with the emerging Rottingdean Neighbourhood Plan and should be in accordance with Rottingdean's housing needs. Whilst the applicant has stated that "the local assessment of housing demand and need" has been researched, it is not clear whether Rottingdean's housing needs have been included in this. These needs are different from the housing needs within Ovingdean and within Brighton and Hove.

### **Proposed site / appropriate in scale / infrastructure**

This application is oversized and inappropriate for this site and its surroundings. The site is now open meadowland, bordering on the South Downs National Park (SDNP) and is part of a strategic gap between the villages of Rottingdean, Ovingdean and Woodingdean. If allowed, this proposal will erode the character of the area and lead to an urban sprawl joining Ovingdean and Rottingdean. It will close the strategic gap which maintains the connectivity of the SDNP. Thus the proposal is unacceptable in compromising the integrity of a single contiguous National Park. It is axiomatic that a development does not have to be within the SDNP to have an impact on its scenic beauty and landscape. Moreover the City Council must have regard to the statutory purposes of the SDNP when considering planning applications outside the park area.

This large proposal will increase housing stock in Rottingdean by 6%; this will have a significant impact on the village's population dynamics and infrastructure in terms of medical, educational, and other services and facilities; and on traffic volume and flow.

Currently there are no primary school places within Rottingdean, and medical and dental services are already under pressure (the number of patients per GP is above the national average). Equally there are no shops close to this development and people will need to travel to Rottingdean and/or Brighton for provisions.

A Planning Brief is already in place for the development of a brown field site within the village of Rottingdean at St Aubyns. Development there will also increase traffic in the village; the cumulative effect of that and this plan for 100 houses will increase what are already recognised by BHCC as dangerous levels of pollution in the village.

Any development must recognise that car usage/ownership in Rottingdean is higher than that of Brighton and Hove, and this should be taken into account when looking at cumulative impacts of traffic, which require objective research and assessment. The applicant's answer to the increase in traffic appears to be to include more sheltered accommodation on the site, which presumes that people housed there will not have vehicles or will not drive at peak periods. These assumptions are not an acceptable response to a very serious problem that occurs not only at peak periods but also at weekends, with traffic tailbacks often backing a long way up Falmer Rd. The applicant's statistics appear to be selective in terms of where and when traffic data has been collected. The closest shops to 'Meadow Vale' are in Rottingdean and it is likely that people will travel there to shop, further increasing traffic into the village.

### **Environment, Ecology and Biodiversity, and Flooding**

The City Council's Biodiversity Action Plan has identified the site as a linear corridor or stepping stone for wildlife. The Sussex Wildlife Trust / Sussex Biodiversity Record Centre recognises the site as SNC1 – again an important area for biodiversity.

There is evidence to suggest that on this site there is:

- The Red Star Thistle - a protected species not easy to translocate
- The Cut Leaf Self-Heal - a rare species, possibly not the only site in Sussex but this is the only regular site.

The site is also used by various birds for invertebrate food as it is a wild, largely untouched area now used for grazing horses. Many calcareous grassland species depend on such thin soils and grazing to provide the perfect habitat for their survival.

Flooding: – the western edge of the site is renowned for its wet and boggy nature. Whilst this has been addressed to some extent by the developers who intend to install "sustainable drainage", the scale of building and increase in hard standing as opposed to the current green field will raise the water levels considerably. The chalk will become saturated increasing the risk of flooding both in The Vale and further down the valley towards Longhill School. The impact of this may not be evident until building has taken place but cannot be underestimated. Roofs and hard standing areas are renowned for collecting water, which would disperse towards the sea.

The Parish Council is concerned that the ecological implications of this development have not been fully investigated and that its impact could be far more detrimental to the wildlife than estimated. Rottingdean Parish Council is gravely concerned that once this has happened there is no way of reversing any negative impacts on wildlife.

### **Land Use Consultants (LUC) assessment of urban fringe sites**

The City Council's consultants who re-assessed the urban fringe sites recommended that, although this site could support some development, it should be restricted to the western edge. The applicants have attempted to contradict this view in their rationale for development. They state that the site is not currently useable or high quality open space – yet it is because of this that the site is so valuable environmentally. Because it has been left wild it does support ecological developments as mentioned above.

The applicant states that open spaces will be re-instated within the development but these will not replace the current meadow field which contains many species which will disappear for ever from this meadowland if their proposal is approved.

The applicant states that the impact of this development on the national park can be mitigated by sensitive design and landscaping. A development of 100 new properties including buildings of 2.5 storeys, with roads and garages, can hardly be classed as sensitive in what is now a peaceful unspoilt meadow. The outline application fails to give any assurance about quality design in keeping with the vernacular architecture. In fact it includes houses of such varied styles and eras as to undermine confidence.

The applicant suggests that this development will have no impact upon the physical extent of the land referred to and no adverse impact on its setting. They also state that the long distance glimpses of the sea are limited to the highest points of the site. Currently there are views to the sea and across meadows from the Falmer Rd and at various points in the South Downs National Park. Again, development on this scale will have a negative impact on these views. They also suggest that development can contribute to Designated Nature Improvement Areas through the retention of habitats and opens spaces, e.g. wildlife corridors. The building of 100 houses will however destroy much of the wildlife and make the need for such a wildlife corridor redundant.

The review undertaken by the applicant, unlike that of the LUC, is not an independent one. It is subjective and supports their need to develop. The construction of 100 dwellings on this site is totally inappropriate which is also the view of the LUC. The Parish Council recognises that the LUC have given an objective view of the site and, whilst we may not agree with the number of houses that they state could be built on the site, we do accept that the LUC's assessment of the site is fair and reasonable.

## **Conclusion**

Rottingdean Parish Council is very well aware of its responsibility to designate sites for suitable housing within Rottingdean, and of the challenging targets that BHCC has been set to provide housing over the next 15 years within the city boundaries.

Over the past 10 years Rottingdean has provided more new homes in percentage terms than Brighton and Hove. This figure has been achieved through incremental growth over the period. The Parish Council's next challenge is to indicate, through our Neighbourhood Plan, potential development sites to allow for the growth needed in Rottingdean over the next 15 years. We hope that this growth is incremental in its nature, and on brown field sites to eliminate the need to use Urban Fringe Sites.

There is already a Planning Brief in place for a brown field site within the village which has the potential to provide some housing. Over the next 15 years there are other brown field sites within the village that may well become available. Growth will occur within Rottingdean but it must be at a pace that our infrastructure can support.

The development of 100 houses on meadowland which forms a natural boundary between the villages of Rottingdean and Ovingdean is not a suitable use of land and would cause considerable stress on an infrastructure that is already overloaded.

**In view of the above Rottingdean Parish Council has resolved to object to the proposed 'Meadow Vale' planning application reference no. BH2014/02589.**

Yours sincerely

James Simister  
Clerk to Rottingdean Parish Council