



Land south of the A271 and east of
the A22, Lower Horsebridge,
Hailsham

Appeal ref: APP/C1435/W/23/3335625

LPA ref: WD/2022/3222/MAO

26 March 2024

Appellant Proof: **PLANNING
(SUMMARY)**

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SUMMARY OF PLANNING EVIDENCE

1. My name is Andrew Elliott. I hold a BSc (Hons) degree in Geography, a MSc in City & Regional Planning and a Master in Business Administration (MBA) and have been a full member of the Royal Town Planning Institute since November 1999. I am a Technical Director of tor&co where I have worked as a town planning consultant since September 1997.
2. My involvement with the appeal site includes advice associated with a pre-application submission in spring 2020 and the submission of the outline planning application in late 2022. I have visited the appeal site and its surroundings on numerous occasions and I have examined the relevant plans and documents for the purposes of the appeal.
3. The evidence that I have prepared for the appeal in this proof of evidence is true and has been prepared and is given in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions and are provided to the Inquiry irrespective of by whom I am instructed.
4. The purpose of the planning application, now at appeal, is to seek to establish the principle of developing the site for residential use.
5. The appeal site is a field that lies adjacent to Lower Horsebridge village, to the east of the A22 Hailsham bypass and south of the A271 Horsebridge road. These busy roads have a strong influence on the structure and character of the area, and cut across the corridor of the River Cuckmere and Lower Horsebridge Stream. The built edge of the 'Welbury Meadows' residential development is visible to the south, beyond the River Cuckmere. The built edge of Lower Horsebridge is to the east, beyond the stream.
6. The proposed built area of the appeal site proposals is concentrated to the north and west, next to the two main roads and Boship roundabout, and opposite to existing residential development fronting the northern side of the A271. An extensive landscape buffer is proposed to the Lower Horsebridge Stream. Structural landscape strips are additionally proposed on the northern and western boundaries of the site.

7. The appeal scheme would sit alongside the river corridor in a similar manner the Welbury Meadows development. This similarly retains and enhances the immediate riverside landscape for biodiversity and public access purposes through a fairly naturalistic approach to riverside landscape planting and management.
8. There is an evolving development context locally, most notably including the Council's own adjacent proposals for its two landholdings at:
 - Knights Farm East, involving a planning application for a proposed 'Wealden Community Sports Hub' comprising various formal outdoor sports facilities, large pavilion building and car park, which is located on undeveloped land to the north of the appeal site, and
 - Knights Farm West, where a strategic Employment Park development is proposed in an undeveloped location to the north west of the appeal site, beyond the Boship roundabout. This site is currently the subject of a draft Wealden Local Plan site allocation policy involving 40,000 sq m (net) of development. This policy is currently being consulted upon by WDC.
9. The known intention of the wider Council to take these adjacent proposals forward was drawn to the attention of the planning case officer before the planning application was determined. Considered strategically alongside other recent planning approvals – including residential developments that will substantially increase the number of homes at Lower Horsebridge compared with its current size – the combination of new major proposals in the locality signal that the urban fringe at north-west Hailsham is a direction for the town's growth. Nevertheless, officers decided to refuse the planning application for the appeal site.
10. Subsequent to WDC's determination of the application for the appeal site there are material changes to the circumstances of the appeal proposals that are relevant to the determination of the planning appeal. Firstly, WDC has resolved to grant planning permission its own proposals for the Sports Hub. And secondly, since summer 2023, an increased frequency of bus services is operating along the A271 site frontage, serving an expanded range of destinations, which substantially enhance the public transport accessibility of the appeal site as well as north-west Hailsham more generally.

11. Influenced by the Sports Hub decision and the local bus service improvements, and following negotiation with the Appellant on further transport improvements and contributions, the local highway authority, East Sussex County (ESCC) has withdrawn its transport objection to the application. Consistent with this, WDC is not now pursuing the non-car accessibility reason for refusal on the application decision notice.
12. There is a statutory requirement that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. However, in Wealden District the development plan (i.e. adopted local planning policy) is out of date in terms of the numerical application of its housing policies, as WDC is not able to demonstrate a five-year (or four-year) supply of deliverable housing land.
13. Where a housing land supply cannot be demonstrated, as in this case, the so-called 'tilted balance' is applicable (as per paragraph 11d of the National Planning Policy Framework - NPPF), whereby there is a presumption in favour of sustainable development unless the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
14. I identify the benefits of the appeal proposals, and the weight I apply to them, as follows:
 - The very substantial weight to be applied to the economic and social benefits of providing homes to meet clearly evidenced need and demand, including in particular a pressing need for additional affordable housing. I also identify the direct and indirect economic benefits associated with constructing the development, and then subsequently the economic and social benefits of spending of the resident population on goods and services when the new homes are occupied.
 - The substantial weight that should be placed to the economic, social and environmental benefits of the transport and access improvements that are proposed on the site frontage to the A271, which will dramatically improve the experience of moving through the area for those on foot, by bicycle and by bus, including future users of the Sports Hub. This is an essential non-car link improvement that will encourage the use of 'active travel' and public

transport in an area that will experience further growth and change. The development of the appeal site can also contribute towards delivering a critical mass of users to support and sustain the bus services. The off-road active travel link on the frontage can only be achieved through use of the Appellant's land, noting that there is no existing footway on the northern side of the A271 and no other available land to widen the highway.

- The substantial weight I place on the environmental and social benefits associated with the proposed expansive landscape planting and new public amenity space provision, that will deliver habitat enhancement at the site including biodiversity net gain and improve connectivity in the local ecological network (consistent for example with the inclusion of part of the appeal site within the River Cuckmere Habitat Link Biodiversity Opportunity Area).
15. The appeal scheme provides an on-site informal green space area for public access that is in excess of four hectares in area, which is larger than the area proposed to be built upon, and well in excess of what would ordinarily be required for a residential development of the scale proposed. The existing stream and woodland on site are proposed to be buffered and enhanced. Overall, the substantial area of strategic landscape planting enclosing the development area would, as it establishes and grows, provide an attractive planted edge that retains the green setting to Lower Horsebridge, the stream corridor and the Cuckmere River corridor in this immediate area. This will offer multiple benefits in terms of public access, amenity and biodiversity, as well as some mitigation to the visual impact of new built development on the remainder of the site.
16. The adverse impacts of the appeal scheme as I see them include the change of the appeal site from an undeveloped green field (which is currently used for grazing horses and sheep on a seasonal basis) to a new combination of built residential development and informal open space / semi-natural greenspace, and the effect of that change on the character and appearance of the immediate surroundings. In addition the less than substantial harm to heritage assets, which is at the lower end of the less than substantial scale, is outweighed by the public benefits of the proposals as described.

17. In my view, the appeal proposals are a logical part of a wider strategy for change at north-west Hailsham, which actively manages the local pattern of growth to meet important development needs whilst enhancing the natural environment and informal recreational experience on the edge of a river corridor. I see the appeal proposal as an essential, integral part of the broader changes that will be experienced at north-west Hailsham in coming years.
18. I consider that the approach to the appeal proposal site is fully in accordance with the positive approach to planning for sustainable development that the NPPF promotes, pursuing economic, social and environmental objectives in mutually supportive ways.
19. The outline planning application is concerned with the principle of developing the site. Through the further process of preparing a design code / masterplan and the subsequent preparation of reserved matters stage detail I am confident that a high quality scheme can be achieved for the site, subject to the adoption of best practice design advice and guidelines.
20. The proposals deliver a range of national planning policy objectives and are compliant with those important local planning policies that are most consistent with the NPPF. In summary the proposals:
 - Promote and support the development of under-utilised land (bearing in mind the limitations of the appeal site for agricultural use)
 - Deliver housing growth, with a mix of dwelling size, type and tenure that can help meet the identified housing needs and demands of the local area
 - Provide development 'in and around Hailsham' efficiently in relation to existing development and to public transport
 - Seek to achieve multiple benefits from urban and rural land including meeting the need for homes, enabling new habitat creation and improving public access and recreation
 - Avoid development in unspoiled or remote countryside or adjacent to statutorily protected landscapes, and

- Encourage the most efficient use of the available land that optimises its potential.
21. I consider that the approach to the appeal proposal site is fully in accordance with the positive approach to planning for sustainable development that the NPPF promotes, pursuing economic, social and environmental objectives in mutually supportive ways.
22. Overall, I therefore conclude and respectfully request that the appeal should be allowed and that planning permission be granted.