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Dear Claire

Land to the south of the A271 and east of the A22, Lower Horsebridge, Hailsham (application ref. WD/2022/322/MAO)

Thank you for offering our client, Hertfordshire Holdings Ltd, the opportunity to submit additional information in respect to this outline residential planning application involving land east of the Boship roundabout at Lower Horsebridge, Hailsham.

Whilst the principal additional content for submission relates to access and transport matters, together with a small adjustment to parameters plans, this letter and its appendices reviews, responds to and provides clarification on all points raised in the statutory consultee responses on a topic-by-topic basis. This approach seeks to narrow down points of concern which officers have raised in respect to this site and application.

Drainage and flood risk

The Environment Agency (EA) is content with the findings of the submitted flood risk assessment (FRA), recommending the implementation of a standard planning condition with respect to development being carried out in accordance with the submitted FRA and the mitigation measures it proposes.

The East Sussex County Council as lead local flood authority / Pevensey and Cuckmere Water Level Management Board confirms that the proposed development is capable of managing flood risk effectively and requires a standard planning condition to set the specifics of the detail design. This condition includes the requirement to undertake groundwater monitoring between November and April when groundwater levels are at their highest (part of the LLFA condition 1d). (NB - The purpose of this testing is to understand the groundwater levels so that the attenuation basins can be designed to preserve their function rather than the groundwater levels being an issue making the basins unsuitable).

The response of Wealden DC's Engineer and Countryside Officer (drainage) states that the information provided within the application is adequate for the application. The response recommends a planning condition requiring the submission of the detailed surface water drainage design prior to development commence.

Overall, the consultee responses confirm that flood risk and drainage are satisfactorily assessed and that appropriate management measures have been proposed.

Cultural heritage

The response from the East Sussex CC Archaeology Officer confirms that the application is satisfactory, subject to planning conditions requiring intrusive archaeological investigations prior to construction. The condition requirement is surprising given the geophysical survey of the site submitted in support of the planning application did not identify any anomalies considered to be potential archaeological remains. It is therefore unclear on what basis the suggested intrusive investigations are justified.

Built heritage feedback was made by the Wealden DC Conservation and Design Officer. It was positive to see that the response identified general agreement with the submitted Heritage Assessment in respect to grade II listed Brook House and the conclusion of a moderate level of less than substantial harm to the asset.

The comments made in respect to the layout shown in the illustrative masterplan are noted, and accordingly the following small adjustment has been made to the masterplan and the development area/heights parameter plan (attached):

- Removal of the development plot closest to Brook House to the east of the proposed access, with the area instead being proposed for landscape planting which can better respect the setting of the listed building.

Traffic and transport

The East Sussex CC Highways response identified no objection to the principle of the site access junction arrangements but does raise concerns related to the site's accessibility by non-car modes and the assessment and mitigation of the impacts of the development on Boship roundabout.

A detailed response to the transport points is provided by consultant Stantec enclosed this letter (Technical Note in response to ESCC Highway and Transport comments), with the key points being:

- The footway fronting the site has been converted to a 3m wide shared walking and cycle path. This will provide a safe, sustainable access to the wider pedestrian / cycle upgrades to the Boship roundabout and connectivity to locations in the wider area (such as the potential area of employment on WDC-owned land to the north west of the roundabout, see location plan in appendix 3). Accordingly, we have submitted revised site access layout drawing ref 332110699_5501_SK09 Rev P01 to include this provision.
- Improved frequency of safe crossing points within the residential area
- A detailed assessment of walking and cycling routes to key destinations has been undertaken and appropriate improvement recommendations made. However, it should be

noted that it is beyond the remit of the developer to deliver or fully fund off-site improvements

- A commitment to provide contributions towards improvements to the existing bus stops to the east of the site and to the provision of an additional eastbound bus stop close to the site (with the most obvious location being the A271 frontage of the WDC-owned site to the north of the A271 and east of Brook House which has been recently consulted upon by the council as a proposed 'community sports hub': material from recent the public exhibition indicates that a principal pedestrian / cycle access to the sports hub site would be in this position, see enclosed plan)
- Provision of an additional westbound bus stop with shelter along the site frontage to the west of the site access junction, which might also serve the community sports hub if that scheme is taken forward
- Confirmation that the modelling of the Boship roundabout shows that in its current form it will be over capacity in the 2030 without the development traffic scenario. But that with the planned improvement scheme, the roundabout would operate comfortably within capacity in the 'with development' scenario. In common with other major developments in the area it is anticipated that development will contribute via CIL to this strategic highway improvement
- Updated tracking drawing to show the access to the site by the required larger size of refuse collection vehicle.

Noise, air quality and ground conditions

The Environmental Health Officer consultation response (from Rother District Council's pollution team on behalf of WDC) confirms acceptability of the noise, air quality and ground condition assessment reports submitted in support of the planning application. The officer recommends approval with conditions in relation to construction activities and detailed design elements.

Biodiversity

The Nature Space Newt Officer responded to the consultation confirming that the ecology survey information is satisfactory but recommends a standard compliance condition to implement the ecological mitigation.

The WDC Biodiversity and Arboricultural Officer has provided an ecological consultation response. This confirms that the submitted ecological documentation is of a good standard and in line with guidance. The response acknowledges the low existing ecological interest of the site and the Biodiversity Net Gain (BNG) proposals and ecological benefits that the scheme offers. It concludes that there is no ecological objection subject to conditions on external lighting, wildlife management, details on biodiversity enhancement and a landscape and ecological management plan.

Landscape and visual

We understand that WDC does not presently have a dedicated in-house landscape officer or a standing arrangement with any specialist officers in neighbouring authorities, and therefore planning officers typically assess proposals in terms of broad landscape impacts, with appropriate inputs from the council's arboriculture and landscape officer. The Arboriculture and Landscape Officer's response on this application focuses on trees and hedgerows (no issues are raised, and standard conditions proposed) and raised no concerns in respect to landscape and visual considerations.

In the council's April 2020 pre-application consultation response, we note that officer concerns focus on harm to the character and appearance of the area and associated conflict with Policy EN8 of the local plan and Policy WCS12 of the Core Strategy.

The applicant's view is provided within the landscape and visual appraisal submitted in support of the planning application. This document, prepared by a qualified and experienced landscape architect, concludes with the following paragraph:

"The effects on landscape and visual receptors will be very localised largely due to the enclosed nature of the site. Landscape effects would be limited to direct effects on the site itself where development would result in a large magnitude of change but indirect effects on the character of the wider landscape would be negligible. Effects on visual receptors would be restricted to the large, or in some cases medium to large adverse effects residents of the limited number of houses close to the developed area of the site and persons using the public footpath that passes close to the site. Visual effects on receptors in the wider landscape would be sometimes small, but mostly negligible to none."

Further comments on character are provided in the section below.

Hellingly Neighbourhood Plan

The Hellingly Parish Council (HPC) response focuses on the development in relation to perceived conflict to neighbourhood plan policies in respect to flooding, biodiversity and protection of rural character.

Policy HNPD3 relates to flood risk. Given that all technical consultees are satisfied with the application (subject to standard conditions), it is considered that there will be no conflict with policy HNPD3.

In respect to Policy HNPD4 – Green and blue infrastructure, HPC noted that a significant part of the site lies within the River Cuckmere Habitat Link. However, it would appear the parish council has overlooked that this part of the site corresponds with the greenspace provision of the proposed development, which will be subject to significant biodiversity enhancements (as demonstrated in the BNG assessment and acknowledged by the Biodiversity and Arboricultural Officer response). The proposal can therefore contribute very positively to the policy requirements of HNPD4.

HPC states a view that the proposed development will be “*filling the space between Lower Horsebridge and Lower Dicker*”, which it considers is in conflict with Policy LHB1 that seeks to protect the rural character of the area and retain the separate character and identity of the four main settlements. Given the location of the built development (the north western corner of the site) together with the provision of the substantial area of open space associated with the scheme (which is heavily influenced by the position of flood zones), we consider that there is limited reduction to the green landscape setting around the historic village of Lower Horsebridge and the key views identified in relation to policy LHB1 are unaffected by the proposed development. Indeed, the submitted proposals enhance the landscape planting and biodiversity of this part of the River Cuckmere Habitat Link, a major planning benefit of the proposals. In considering the wider context of the village setting, the plan provided in appendix 3, showing the approved and proposed/potential development in the north west of Hailsham, clearly identifies that development in the vicinity of Lower Horsebridge incorporates significant areas of planting and open space, thus retaining the green corridor around the village to the west, south and east.

The proposed development lies outside of the “village area” as shown on map 4 of the neighbourhood plan (which is presumably the same area as the Lower Horsebridge Character Area referred to by Policy LHB1). There are a number of other recently built or approved developments within the Hellingly parish which similarly lie outside of the four main village areas of the parish. In the context of Lower Horsebridge, this includes the two consented residential schemes on either side of the B2104 North Street to the north of the village, with a notable proportion of both sites being outside the identified village area (see appendix 3). There is no specific policy within the neighbourhood plan that prohibits residential development outside of these village areas.

HPC also raises an objection in relation to siting houses close to the A22, in respect to noise and air pollution, and the proposed junction onto the A271 in relation to queuing traffic and the road bend. However, the statutory consultees (Rother District Council EHO in respect to air quality and noise, and the ESCC highways on the access arrangements) do not object on these matters.

The need for housing / five year housing land supply

There continues to be an insufficient supply of deliverable housing sites to meet WDC’s five-year land supply requirement in accordance with the NPPF. The current published figures show a 3.92 year supply as of 1 April 2022 (WDC Five Year Housing Land Supply Statement, published December 2022) and therefore the NPPF presumption in favour of sustainable development remains engaged.

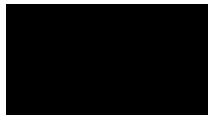
Summary

The additional transport information submitted within this letter is considered to appropriately respond to the points raised by ESCC highways such that NPPF policy requirements can be met. We hope that your previously raised areas of concern are alleviated by the other statutory consultee responses, which demonstrate that, subject to standard conditions, the proposed residential development is acceptable.

Whilst officers continue to have concerns with respect to the location of the site and the potential effects of the development to the receiving landscape, we feel that the benefits offered by the development (including provision of market and affordable housing, pedestrian and cycle improvements, increased public access to green space, biodiversity net gain and landscape planting enhancements) outweigh any harm.

We trust that the summary provided in this letter helps to narrow down - or eliminate - areas of concern in respect of your forthcoming decision. We would be happy to discuss the content further if necessary.

Yours sincerely



Jo Baker
Associate Director

cc



Hertfordshire Holdings

Enclosures:

- Revised parameter plan and illustrative masterplan
- Revised site access layout drawing
- Technical Note in response to ESCC Highway and Transport comments
- Location of other consented and potential development in the local area