

Hindsland, Willingdon

Design Position Statement
Danescroft (FREOF V Willingdon) LLP
30th May 2022

LF64628/01

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1.0 Introduction

- 1.1

This Design Position Statement has been prepared on behalf of Danescroft ((FREOF V Willingdon) LLP to provide an independent review of the design matters in connection with an appeal against the non-determination of an application for planning permission (ref WD/2021/0594/MEA) for the development of land at Hindsland, Eastbourne Road, Willingdon by Wealden District Council (WDC).
- 1.2

The Appeal Scheme is for:

“Outline Application all matters reserved except for access (excluding internal estates roads beyond the access to serve the Medical Centre Plot) for demolition of existing vacant dwelling and erection of up to 180 no. dwellings and medical centre together with all parking, servicing and onsite open space”
- 1.3

As confirmed by the Statement of Common Ground (SOCG), the Council has raised no concerns regarding the urban design of the Appeal Scheme including the indicative layout and the appropriateness of the approach to the understanding of character and appearance. However, third parties in commenting on the planning application have raised a number of matters including that the Appeal Scheme would:

1.

harm the identity of the settlement;

2.

not be in keeping with its context;

3.

adversely affect the Conservation Area;

4.

have excessive levels of development;

5.

have an inappropriate layout;

6.

lack of green/ recreational space; and

7.

have an adverse affect on surrounding properties.

1.4

This DPS addresses these points and in doing so provides:

1.

A brief overview of the character of the existing site and its surrounding townscape context;

2.

A summary of design policy and guidance relevant to the consideration of the Appeal;

3.

An assessment of the acceptability of the illustrative scheme and the general quantum of development proposed in relation to requirements of planning policy and guidance on the need for high quality design and creating well-designed places that would be compatible with the character of the area and maintain local distinctiveness.

1.5

This DPS has been prepared to address matters of the design and urban design of the Appeal Scheme and its suitability for its urban context. Planning matters are dealt with by Mr David Neame of Neame Sutton. All matters relating to the landscape and visual effects of the Appeal Scheme are dealt with by Mrs Clare Brockhurst of Leyton Place Ltd.

1.6

In preparing this DPS reference has been made to relevant material submitted as part of the planning application including the Design and Access Statement, Landscape Masterplan, Indicative Site Layout and Landscape and Visual Impact Assessment.
- ## About the author
- 1.7

The Design Position Statement (DPS) has been prepared by Judith Livesey BA Hons (Architecture) MA (Architecture and Town Planning) MRTPI. She is a Planning Director in Heritage and Townscape Team at Lichfields.

1.8

Judith has been a member of the Royal Town Planning Institute since 1994 and has almost 30 years’ experience working as a planner and urban designer in both public and private sectors. She joined Lichfields in 1998 having previously worked for Barnsley Metropolitan Borough Council as an urban designer for four years, preparing development briefs and providing comments on planning applications, and subsequently as development management planner.

1.9

She has wide ranging experience of providing urban design, townscape, planning and heritage inputs to residential and mixed use projects. This has included: undertaking context analysis for masterplanning and urban design projects; preparing masterplans, design codes and illustrative layouts; providing independent urban design critiques of schemes and their suitability for their contexts as well as undertaking townscape and visual assessments of residential and mixed use developments for submission with planning applications.

1.10

She has advised a range of private and public sector clients on urban design and townscape matters including Aitch Group, Commercial Estates Group, Fairview New Homes, U+I Group Plc, Wates Developments, St George Plc, Barratt London, Danescroft Land, Weston Homes, Inland Homes, Notting Hill Genesis, Peabody, Southern Housing Group, Clarion Housing, Citrus Group, Redrow Homes, Royal Borough of Kensington and Chelsea, London Borough of Harrow and Worthing District Council.

1.11

In preparing this DPS she has reviewed the application submission and visited the site and surrounding area.
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- 4

2.0 Relevant planning policy context

2.1	The relevant statutory development plan for the assessment of the suitability of the design of the scheme for its context is the adopted Wealden District Core Strategy (2013) and saved policies of the Wealden Local Plan 1998.	<i>less traditional solutions providing they embody the principles of good design which respects the characteristics and quality of the existing site and its surroundings.” (12.9)</i>	8. Homes and Buildings;
2.2	The site lies within a Strategic Growth Area identified within the Core Strategy Policy WCS4: SD4 to the south of Polegate and east of Willingdon. The following policies identified in the SOCG are relevant to the consideration of the appropriateness of the design for its urban context: 1. EN1 (Sustainable development - location, layout, and design); 2. EN27 (Layout and design of development); 3. HG5 (Mix and incorporation of natural features); and 4. HG6 (Crime prevention in new developments)	2.5 The NDG (para 22) confirms that well designed places need to have considered the following components of places, providing further detail at paras 23-30: 1. Layout – including structure/ settlement pattern, grain (blocks and plots) the distribution of uses and their density or building height; 2. Form and scale of buildings – size and shape, height, bulk and massing, building lines and relationship to plot boundaries; 3. Appearance – including the visual impression of a building or space including its built form, architecture, materials, decoration, colour and texture; 4. Landscape – the treatment of land including landform, surfacing, boundary treatments and planting; 5. Materials – including durability, attractiveness and appropriateness for development type and context; and 6. Details – the individual components of a building and how they are constructed.	9. Resources; and 10. Lifespan.
2.3	Other policy and guidance that are material considerations include: 1. National Planning Policy Framework (NPPF), in particular section 12 (paras 126-131), July 2021; 2. National Design Guide (NDG); 3. National Model Design Code (NMDC); and 4. Wealden Design Guide (WDG) (2008).	2.6 It defines the following characteristics of well-designed places which are considered in more detail in the NMDC1 and NMDC2: 1. Context; 2. Identity; 3. Built form; 4. Movement; 5. Nature; 6. Public Spaces; 7. Uses;	2.7 In general terms the design policy context requires that: 1. Development responds appropriately to the locally distinctive character of the context having regard to matters including: • Layout • Scale and Built form • Site coverage and density • Design , details and use of materials • Landscape 2. Development is of the requisite high quality in terms of its function and appearance 3. There should be no unacceptable impact on privacy and amenity of adjoining developments due to scale, height or form and that appropriate amenity should be provided to new residents.
	Well-Designed Places 2.4 The WDG (para 12.8-9) states: <i>“Key principles of good design include the importance of architectural details, scale form and massing, roofs, windows, front entrances and porches, materials, balconies, conservatories and atria, garages and ancillary buildings, and services...”</i> <i>“Local distinctiveness is particularly important and every effort should be made to avoid standard “off the shelf” designs and/or inappropriate materials or detailing or superficial attempts to reflect local character. This does not preclude</i>		



3.0 Existing conditions and constraints

Appeal Site and its immediate context

- 3.1 The Appeal Site comprises disused private playing fields situated between the urban areas of Polegate and Willingdon to the north and south respectively (Figure 1). The site is mainly grassed with the exception of a disused house on the frontage to Eastbourne Road (photo 1 on following page), and some areas of hardstanding associated with former sports facilities and a pavilion¹. The electricity substation adjacent to the house lies outside the red line boundary.



Figure 1: Site location plan (Source: Google Earth); site indicated in red

¹ Design and Access Statement, 2021; page 10

3.2 The site is rectangular in shape and bound by:

1. Eastbourne Road (A2270) to the south-west which connects Polegate and Willingdon with Eastbourne. There is a wide grass verge on the site frontage together with timber fencing and areas of scrub and mature trees (photos 2-3). On the south-west side of Eastbourne Road are a combination of detached/semi-detached houses and bungalows that are set well back from the frontage with a wide grassed verge, pavement, and large front gardens (photos 4-6);
2. A line of mature trees to the south-east, beyond which are fields which form part of Mornings Mill Farm;
3. To the north by a combination of fencing and sporadic planting (photo 7). Beyond this lies the rear gardens of houses and bungalows on Spurway Park (nos 32-35) (photo 8) and Brightling Road (nos. 37-47). No 35 Spurway Park has a blank side gable adjoining the site. The suburban residential neighbourhood extends northwards to the centre of Polegate, around 500m from the site's northern edge.
4. To the north west are the rear gardens of bungalows at 1-5 Courtland Road (photo 9), to the south-west of which is an area of land (also formerly playing fields) that is overgrown with some trees along the boundary. This area extends to Eastbourne Road. Around 170m north-west on the Eastbourne Road frontage is a petrol filling station with convenience store, as well as additional housing to the west of Eastbourne Road and playing fields serving Polegate Town Football Club.



Photo 1: Disused house to south of site



Photo 2: Fencing and scrub along western edge of site



Photo 3: Grass verge and scrub along western edge of site



Photo 4: View towards housing on western side of Eastbourne Road



Photo 5: Grass verge along western edge of Eastbourne Road



Photo 6: Setback houses along Eastbourne Road



Photo 7: Fencing along north-eastern edge of site



Photo 8: North-eastern boundary towards Spurway Park



Photo 9: Courtland Road properties along site's north-western edge

Character and appearance of the surroundings

- 3.3 To establish the townscape character of the surrounding area and the contribution of the application site to this character, fieldwork and desk study has been undertaken to define its key characteristics – the physical, experiential, aesthetic and perceptual factors –that give the wider urban area its distinct sense of place.
- 3.4 Based on the Guidelines for Landscape and Visual Assessment, 3rd Edition (GLVIA3) (para 5.5) and NDG (para 34), this has considered the following aspects of townscape character where relevant:
1. Wider context;
 2. Topography and relationship to built form;
 3. Historic evolution;
 4. Land use and activity;
 5. Street pattern and movement;
 6. The urban grain – urban blocks, development plots and buildings;
 7. The scale, mass, form and proportion of buildings;
 8. Building style, details and use of materials including vernacular traditions; and
 9. The public realm including the role of open spaces and vegetation.

Wider Context

- 3.5 Figure 2 shows the wider context around the site.
- 3.6 Within the settlement of Polegate, around 500m north of the Appeal Site is Polegate High Street where there are a range of shops and eateries, a public house, a church and other community facilities and businesses serving the surrounding area (photo 10). There is a railway station with services to Brighton, Eastbourne and beyond. There are further retail and community uses along Station Road, and playing pitches and a skatepark at Brightling Road Leisure Ground.

- 3.7 To the south-west and south are the areas of Willingdon, Wannock and Lower Willingdon; these are large areas comprised of predominantly residential neighbourhoods. The area includes a number of civic uses including Willingdon Primary and Community Schools and open amenity spaces including Tott Yew Park and Huggetts Lane Recreation Ground.
- 3.8 There is a small historic local centre located perpendicular to Eastbourne Road incorporating the Church Street Conservation Area. This is around 1.5km from the Appeal Site and there is no intervisibility between them.
- 3.9 The South Downs National Park borders the edge of Wannock and Willingdon to the west; the surrounding hills providing an elevated backdrop to views out of the area.
- 3.10 Farmland extends eastwards from the Appeal Site and Mornings Mill Farm towards the trainline and the edge of Lower Willingdon, to the opposite side of which are located a series of wetlands incorporating a number of ditches and streams. Further east is the Golden Jubilee Way/A22 dual carriageway connecting to Eastbourne.



Photo 10: Polegate High Street

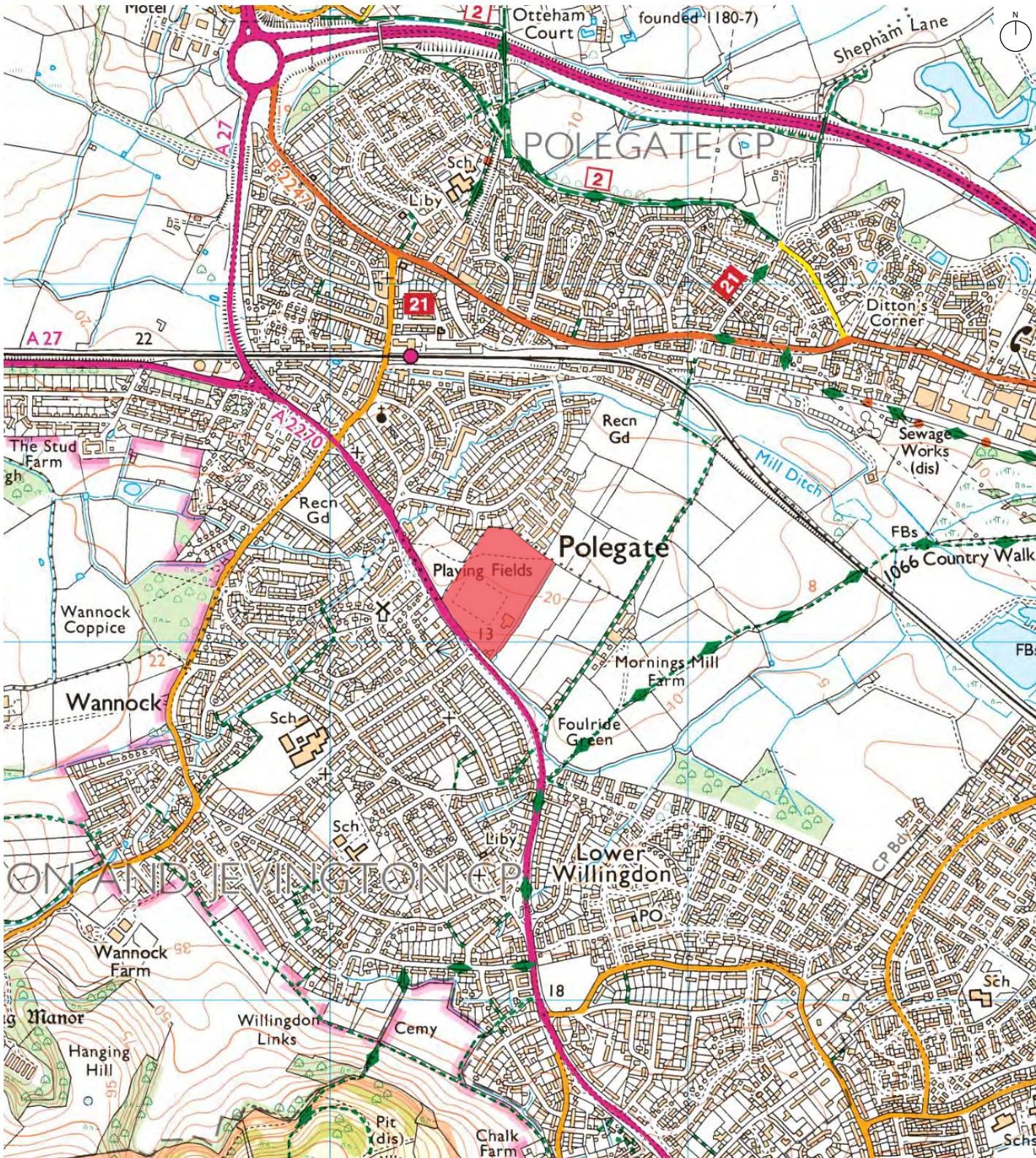


Figure 2: Wider context plan (Source: OS Open Map 2020); site indicated in red

Topography

- 3.11
- Figure 3 shows the topography of the site and surrounding areas.
- 3.12
- The topography of the site is influenced by its former use as playing fields with level plateaus and some embankments. There is a general fall from north to south from a high point along a north-west/south-east axis, with a level change from approximately +21m to +12m AOD.
- 3.13
- The general topography of the wider area falls from north to south towards Willingdon from the centre of Polegate. A further rise is subsequently present towards the centre of Eastbourne to the south, resulting in a series of undulating hills.
- 3.14
- The presence of the South Downs to the west, which rise swiftly to +95m AOD, define the edges of the area and provide the town with an almost valley-like setting, though by contrast the open land to the east of the site is largely flat towards the wetland areas, with a minor increase in level change present within Stone Cross.

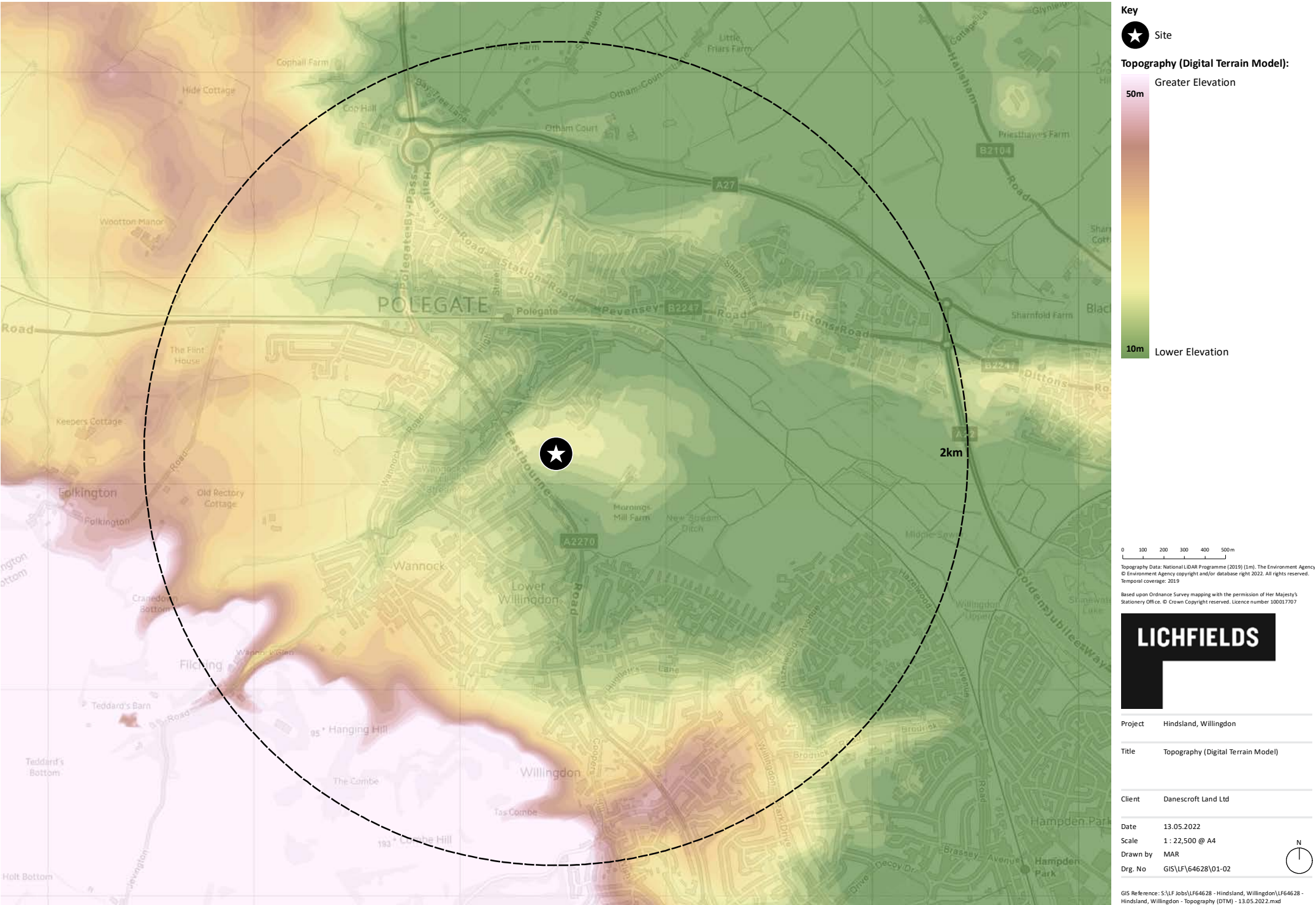


Figure 3: Topography plot (Source: National LiDAR Programme (2019))

Historic Evolution and Heritage Assets

- 3.15 The historic evolution of the site is shown in Figures 4-7.
- 3.16 At the end of the 19th century, the site was part of a larger area of agricultural land south of Polegate. A field with the same boundaries can be seen on Figure 4 together with Eastbourne Road and a house in the southern corner. The site was converted to playing fields during the mid-20th Century.
- 3.17 It can be seen from Figure 4 that there has been a station serving Polegate since the mid 19th Century. A second station was built 300 yards east of the current station site in 1881 to serve a new route from Eastbourne to Halisham; this was

- closed in 1886 along with the railway line, which is now the Cuckoo Trail footpath and cycleway². The High Street, Church Road and St. John's Road within Polegate are also seen on the 1899 OS together with Station Road and an area north-west of the High Street. There had been some limited expansion and development during the early 20th Century as shown in the 1928 OS (Figure 5), including development along Eastbourne Road.
- 3.18 Figure 6 shows that by 1961, further residential development had occurred to the east of Polegate's centre, replacing former nurseries and agricultural land. Residential expansion continued eastwards along Station Road/Pevensey Road including a new development at Ditton's Corner in the 21st century. The town centre has remained largely unchanged

- barring some infill development along the High Street and around the station.
- 3.19 Willingdon began as a small settlement, formed of Lower Willingdon which originated around The Triangle and Wannock Lane, and Willingdon itself further to the south which incorporated Church Street – today a conservation area that has retained its distinct historic character. From the mid-20th Century, residential development expanded rapidly to the south west of Eastbourne Road including some post-war housing estates. The 1961 OS map shows that by this time the two areas of Willingdon and Polegate had coalesced. Subsequent development was added during the 1970s/80s to the south-east of the site below Mornings Mill Farm as shown on the 1981

- OS (Figure 7), which connected the area with Hampden Park further east.
- 3.20 There are no designated heritage assets within the Appeal Site. The closest listed building is the Grade II*-listed Polegate Windmill situated around 200m to the west. Church Street Conservation Area is located approximately 1.4km to the south-east of the site, whilst the Jevington Conservation Area is situated approximately 3km to the south-west. The site is situated within the Willingdon Levels: prehistoric wetlands Archaeological Notification Area (ANA)³.
- 2 Historic Building Recording of the Old Polegate Station, 2017; pg. 7
- 3 Historic Environment Desk-Based Assessment, 2021; page 11

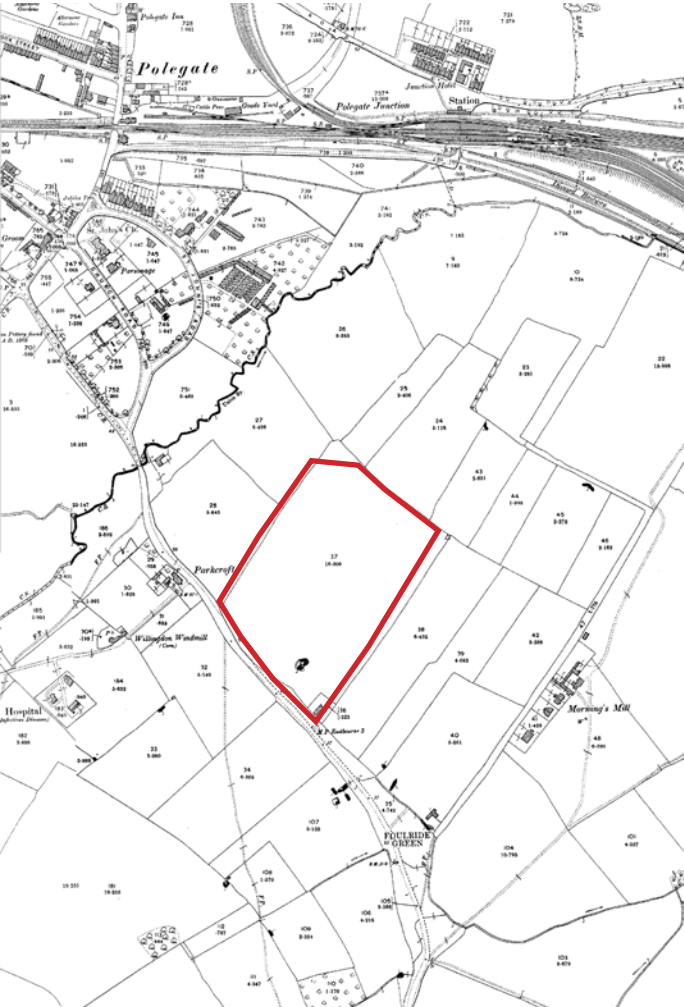


Figure 4: Historic map c. 1899 (Source: Landmark Historical Map)

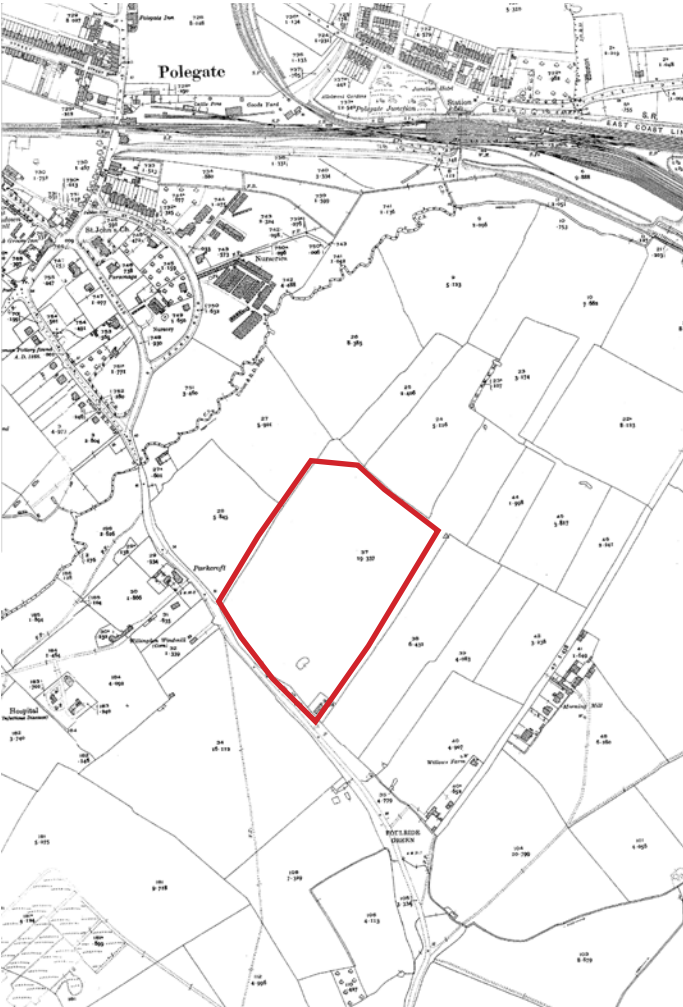


Figure 5: Historic map c. 1928 (Source: Landmark Historical Map)



Figure 6: Historic map c. 1961 (Source: Landmark Historical Map)

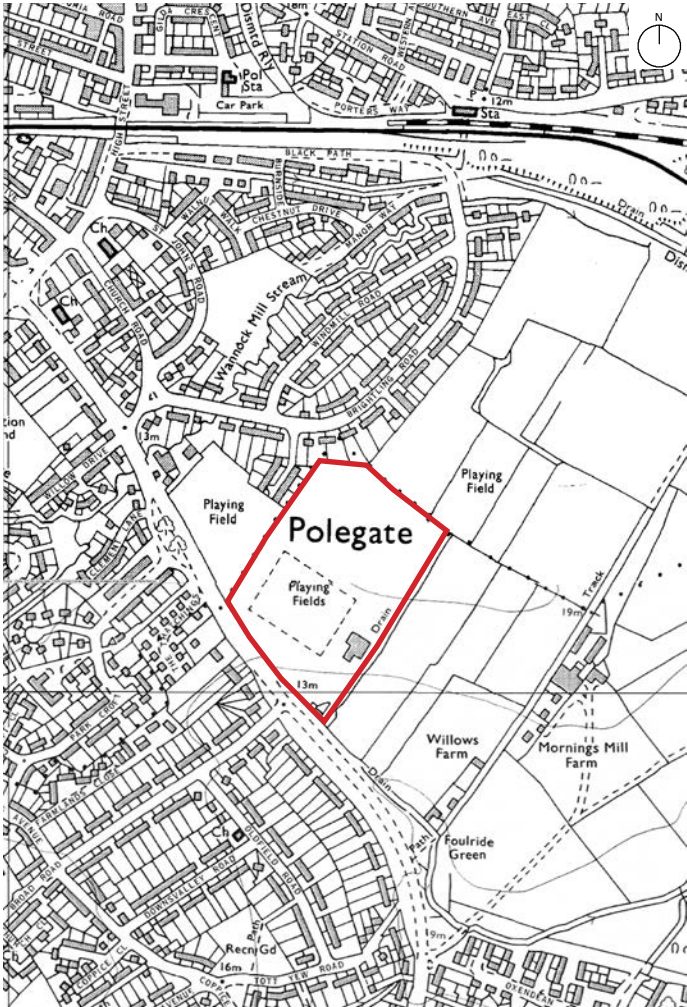


Figure 7: Historic map c. 1981 (Source: Landmark Historical Map)

Land use and activity

- 3.21 The predominant land use in the surrounding area is residential with a variety of housing types and forms. Other amenities, including schools and other community facilities are located sporadically throughout the area, usually along primary or secondary routes.
- 3.22 The greatest concentration of shops and other facilities is located in Polegate along the High Street and close to the station. This is reflected by higher levels of pedestrian activity in this area. Willingdon's historic centre features a small number of amenities including a post office and public house. To the north of Huggetts Lane, a number of shops serves the surrounding residential area to the east of the A2270.
- 3.23 In some locations the built form is arranged to enclose small areas of amenity space or, in the case of large buildings and community uses, to sit within space.

Street Pattern and Movement

- 3.24 The primary connecting roads reflect historic routes between places.
- 3.25 There is variety in the street pattern and the shape and scale of urban blocks in the surrounding areas of Polegate and Willingdon. They are generally defined by a series of gently curving alignments, creating mainly varied irregular curving urban blocks with frequent cul-de-sacs in the residential areas. An exception to this is Broad Street, which runs in a straight line between Eastbourne Road and Wannock Lane resulting in some rectangular/deformed rectangular blocks along its extent.
- 3.26 Residential areas around the site are generally quiet with limited amounts of pedestrian and vehicular movement. Eastbourne Road is a main route to the centre of Eastbourne to the south.
- 3.27 The area possesses a reasonable hierarchy of streets and routes. Primary movement patterns run broadly from north-south via Eastbourne Road and Wannock Road/High Street, with the exception of Station Road/Pevensy Road which extend to the east connecting with the A22. A series of secondary routes cross surrounding residential areas, though permeability is restricted in places by the railway line and cul-de-sac development patterns.

- 3.28 The adjacent residential area to the north of the Appeal Site connects via a number of routes to Polegate High Street, including Church Road, St. John's Road and the Black Path. A pedestrian connection also runs underneath the railway line to Pevensey Road. Bus stops are available on Eastbourne Road close to the Appeal Site. A number of public footpaths and cycleways, including the 1066 Country Walk and Cuckoo Trail, connect residential areas around the site with the wider area, including Stone Cross, Langney and the South Downs National Park⁴.
- 3.29 Private driveways are present on many residential plots, which reduces the extent of on-street parking in many areas. These are less present towards the town centre where streets and setbacks are generally narrower.

Urban Grain

- 3.30 Figure 8 shows the urban grain of the surrounding context.
- 3.31 There is a relatively fine grain of linear residential plots that are largely rectangular shaped, with varying sizes of plots and rear gardens. Historic terraces in the centre of Polegate have smaller plots (1) whereas the mid-20th century residential estates have larger plots (2). These are interspersed with some medium to large-sized plots where flats, sheltered housing and non-residential uses are introduced (3).
- 3.32 Buildings are generally positioned in a perimeter block arrangement with a consistent set-back from the frontage. There is variation in the extent of the set-back of the building line. There is a generous set-back of around 30m along Eastbourne Road (4), whereas in other this is reduced - varying between 9 and 12m in the properties immediately to the north along Brightling Road (5) and between 11 and 13m to the south-west along Broad Road (6).



Figure 8: Urban grain plan (Source: OS Open Map - Local (2022)); site indicated in red

Built form

- 3.33 Building typologies vary according to the age and period of development. There are some estate developments with similar repeated typologies (e.g. those along Brightling Road and Park Croft, photos 11-12) as well as more varied estate and infill development (e.g. those along Oxendean Gardens, Broad Road, Huggetts Lane and Eastbourne Road, photo 13).
- 3.34 The residential areas are characterised by a mixture of semi-detached and detached house types of various heights (photos 11-15). These include bungalows, dormer and chalet style bungalows and 2-storey dwellings, many of which feature dormer roofs with tall pitches.
- 3.35 There are both narrow and wide fronted types of detached and semi-detached houses and a variety of roof forms comprised of predominantly gabled, hipped and half hipped roofs orientated both parallel and perpendicular to the road (photo 16). Some examples of mono-pitched, flat and mansard roofs are also present on some later 20th century developments (photo 17).
- 3.36 There are also larger footprint residential buildings of varying heights (1-3 storeys) and 3-storey apartment buildings within the surrounding area (photo 18).
- 3.37 The Mill development at Ditton's Corner is an example of a more recent high quality residential development with a range of residential building typologies of 2-3 storeys in height with detached, semi-detached, terraced and apartment forms arranged in small perimeter blocks (photo 19).



Photo 11: Brightling Road



Photo 12: Park Croft



Photo 13: Broad Road



Photo 14: Example of bungalow housetype along Brightling Road



Photo 15: Example of detached housetype with dormer roof



Photo 16: Gabled roofs visible along Park Croft



Photo 17: Example of mansard roof along Polegate High Street



Photo 18: Example of 3-storey apartments above retail along Pevensey Road



Photo 19: Example of semi-detached and apartment types at The Mill development

Architecture, details and materials

- 3.38 There are a range of architectural styles in the surrounding area with building materials and details generally reflecting their period of construction.
- 3.39 The local vernacular includes the use of flint, red brick, lime render, clay tiles and weatherboarding⁵. The predominant walling materials are brick and render with some hanging tiles. This is particularly evident in older residential buildings (photos 20-21) although this palette is also utilised in more contemporary development (photos 22-23). Stone and flint is present in some older buildings, particularly those with a public use (e.g. St John's Church).
- 3.40 There is a predominance of red brick including some red-pink and red-brown tones as well as some buff bricks. There are also examples of fully and part-rendered building frontages and decoration including hanging tiles, timber weatherboarding and half timbering in the 20th century and more recent housing areas (photos 24-25). Building detailing includes a range of features including bays and porches as well as projecting gables with both hipped and gabled roofs.
- 3.41 Roofing materials include traditional red clay tiles as well as red/grey concrete tile roofs. There are a range of dormer types including flat roof and pitched as well as wall and eaves dormers (photos 26-27).
- 3.42 Later 20th Century buildings are typically more restrained in their use of detailing and tend to be standard types rather than relating to the local vernacular. There are some exceptions, such as in The Mill scheme to the north-east which has utilised horizontal white timber boarding (photo 28).



Photo 20: Red brick building on Polegate High Street



Photo 21: Use of red brick and hanging tiles along Church Street



Photo 22: Use of red brick in Spurway Park development



Photo 23: Use of red brick and hanging tiles in The Mill development



Photo 24: Use of rendering on buildings along Eastbourne Road



Photo 25: Use of rendering on buildings within The Mill development



Photo 26: Wall dormers on terraced houses along Pevensey Road



Photo 27: Dormers with balconies along Chestnut Drive



Photo 28: Use of timber weatherboarding within The Mill development

Public realm and landscape elements

- 3.43 Many residential areas are characterised by generally wide streets with grass verges of various widths separating pavements from the road, with dwellings set back from the latter behind low brick walls, front gardens and driveways (photo 29-31).
- 3.44 Open space within the wider urban area is comprised of formal recreation grounds, school playing fields and smaller areas of amenity space within the surrounding development (e.g. Farmlands Court, Polegate Windmill, Oxendean Gardens, photo 32-33).
- 3.45 There are generally few street trees, with the exception of Broad Road and Eastbourne Road although there are many trees within rear gardens.
- 3.46 More recent developments, such as The Mill scheme, have larger open spaces overlooked by development as well as peripheral open spaces (photos 34-36).
- 3.47 There is access to the wider countryside via the public footpath network and views to the higher ground of the South Downs National Park from various locations in the surrounding area (photos 37).



Photo 29: Front gardens along Brightling Road



Photo 30: Verges and driveways along Broad Road



Photo 31: Grass verges along Romney Road



Photo 32: Polegate Windmill



Photo 33: Open space adjacent to Oxendean Gardens, Seven Sisters Road



Photo 34: Open amenity space within The Mill development



Photo 35: Play space within The Mill development



Photo 36: Peripheral open space within The Mill development



Photo 37: View towards South Downs National Park from Gorringe Valley Road

Townscape Sensitivity

- 3.48 The value of the existing townscape character of the surrounding urban areas of Polegate and Willingdon has been defined having regard to the criteria set out in Appendix 1.
- 3.49 The surrounding townscape developed predominantly in the mid to late 20th century and is not protected by any conservation area designation. The only listed building in the area is Polegate Windmill which is surrounded by 20th century residential development. The Historic Environment Desk-Based Assessment (2021) (para. 6.4.5) states that:

“the ability to experience the windmill within its wider setting is minimal due to the surrounding residential development and the presence of many mature trees that almost reach similar heights to the windmill. From the site, which is set at a higher elevation than the windmill, only the cowl and sails [can] be identified”.
- 3.50 The closest conservation area is in Lower Willingdon, some distance from the Appeal Site and visually separated from it by residential development within Lower Willingdon. Elements of undesignated historic townscape dating from the 19th century are generally located around the centre of Polegate in the vicinity of St John’s Church.
- 3.51 The townscape of the surrounding residential area has a degree of coherence in the placement of buildings, materials palette and the integration of verges, but has considerable variation in its architectural quality. There is a general lack of local distinctiveness in the architectural character of buildings with the majority being standard types.
- 3.52 As recognised in the Wealden Design Guide (para 8.2):

“..since the middle of the 20th Century, awareness and poor interpretation of ‘local distinctiveness’ resulted in new development of a standard type which largely failed to build on this character.”
- 3.53 There are a range of scales of buildings (1-3 storeys but predominantly 1 and 2 storeys) with variation in the sense of enclosure along streets and in the

residential building typologies. Community uses are both concentrated in the centre of Polegate and dispersed throughout the wider residential areas. These have a range of scales and forms but are typically larger buildings of two or three storeys set within their own plots. The area has an unremarkable, suburban residential character.

- 3.54 Having regard to the characteristics of the existing townscape, the area is considered to have a Medium townscape value.

Urban Design Constraints and Opportunities

- 3.55 The identified site constraints pertinent to this DPS are shown in Figure 9, and include the following:

1. Access from Eastbourne Road;

2. The desire to retain existing boundary hedgerows and tree belts and enhance these wherever possible;

3. The existing neighbouring properties to the north and south;

4. Potential noise from main Eastbourne Road;

5. Land safeguarded for medical centre with access scale, form to be considered;

6. Topography of the site;

7. Drainage ditch aligned with eastern boundary;

8. High voltage electricity cable and associated 5m easement zone on northern boundary; and

9. Mains water pipe and associated 13m easement zone on southern boundary with Eastbourne Road.⁷
- 3.56 The key opportunities and aspirations for the development include:

1. The opportunity to retain and reinforce the existing landscape framework to the site boundaries;

2. A new, safe access into the site from Eastbourne Road;



Figure 9: Constraints plan (Source: Design and Access Statement, OSP Architecture, March 2021)

3. The creation of a scheme with an appropriate scale of new development for a sensitive edge of built up area location;
4. A housing mix with a proportion of both smaller dwellings and affordable homes in accordance with planning policy;
5. Meeting WDC aims and aspirations in terms of design and quality;
6. Complying with the National Planning Policy Framework (NPPF);
7. The creation of a high quality residential scheme in keeping with the character and appearance of the area;
8. Creating a distinctive pattern of development in keeping with the surrounding context; and
9. The provision of a high quality public realm with informal areas of open space⁷

4.0 Assessment

The Appeal Scheme

- 4.1 The summary of the key features of the Appeal Scheme are as follows:
1. A state-of the art new medical centre to serve the local community located along the frontage to Eastbourne Road for ease of access.

2. Up to 180 new high quality family homes.

3. A broad mix of dwellings consisting of 1 & 2 bedroom apartments and 2, 3 & 4 bedroom houses

4. 63 affordable dwellings (35%).

5. New vehicular access from Eastbourne Road

6. New areas of open space. The proposal offers generous areas of new planting of trees, hedgerows and shrubs using locally native species

7. Retention of existing boundary tree belts and hedgerows with additional ecological enhancements

8. Significant enhancement of the boundaries to buffer the development.⁹
- 4.2 The illustrative layout of the proposal is shown in Figure 10.



Figure 10: Proposed Illustrative Layout (Source: Design and Access Statement, OSP Architecture, March 2021)

9 Design and Access Statement, 2021; page 36

Analysis of Indicative Layout

4.3 The following section analyses the suitability of the indicative layout for its surrounding urban context, having regard to the main townscape characteristics outlined in Section 3. The analysis has also drawn on guidance on creating well-designed places contained with the WDG, NDG and NMDC2.

Land use and activity

4.4 The main use across the site is residential, with a new medical centre occupying part of the site frontage to Eastbourne Road. A mix of houses and flats is proposed including some affordable housing. The residential land use would be consistent with the adjacent residential land uses and benefits from the proximity of existing facilities and public transport connections in Polegate and the surrounding area, including bus stops on Eastbourne Road.¹⁰

4.5 The combination of residential and community uses is consistent with the general pattern of existing land use and their distribution throughout existing residential areas. A mix of uses, house types and tenures are also advocated in the National Design Guide (para 111) and National Model Design Code (para 64) and the inclusion of the medical centre and the apartment buildings helps to provide a greater mix of unit sizes.

4.6 The site forms part of a strategic development allocation in the Core Strategy WCS4: SD4 and the proposed land uses are acceptable in principle to the Wealden District Council.¹¹

Street Pattern and Movement

4.7 The illustrative layout comprises a hierarchy of streets, including a circular ‘main street’ route that circumnavigates the site. Connections to surrounding neighbourhoods are formed by pedestrian routes¹²; in this case the provision of through routes for vehicles to the existing residential area as recommended, where possible, in the National Model Design Code (para 59) would not be possible in this case due to land ownership. However, in keeping with these principles, the potential for future vehicular connections to adjacent land is safeguarded, although the development of these areas or links to them does not form part of this proposal.

4.8 Lower order neighbourhood streets, shared surface lanes and green lanes provide connections to create permeability for vehicles, cyclists and pedestrians. Each street type has a different character which reflects their role and is overlooked by development. This would help to create variety and legibility as recommended in the National Design Guide (para 80) and NGD2 (page 43).

4.9 The layout seeks to encourage non car-based modes of transport and potential pedestrian connections to bus services on Eastbourne Road as well as those to the north-west and south east, which will provide links to facilities and services in the wider area.

4.10 The proposed street pattern reflects the surrounding area, with a hierarchy of different types and widths of streets. Similar to surrounding neighbourhoods, there are both loop roads and cul-de-sac arrangements present. The proposed cul-de-sacs are tertiary street types as suggested by the National Model Design Code (para 59).

10 Transport Assessment, 2021; page 18
11 Statement of Common Ground, 2022; page 6
12 Design and Access Statement, 2021; pages 49-50

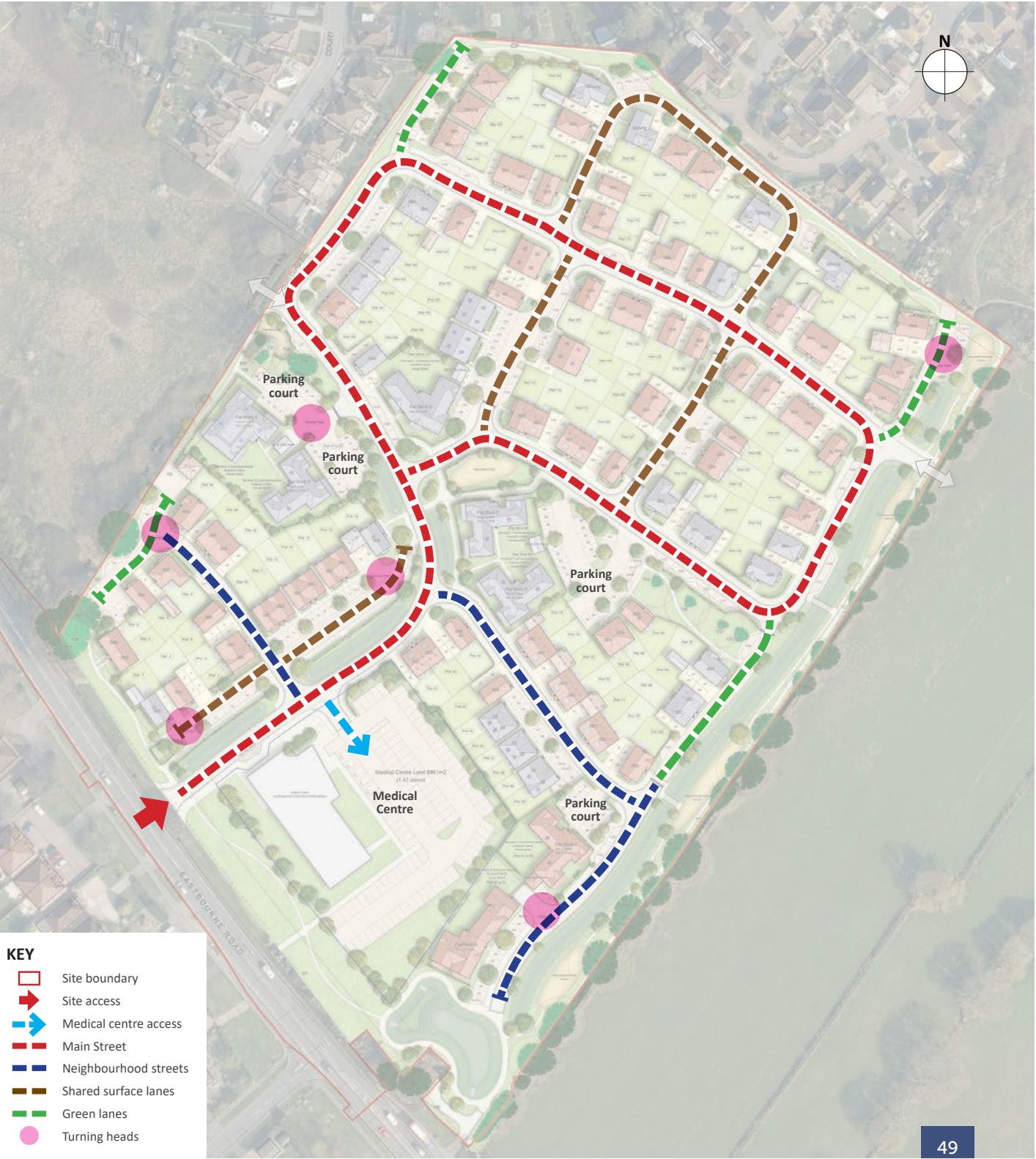


Figure 11: Street Network Plan (Source: Design and Access Statement, OSP Architecture, March 2021)

Urban Grain

- 4.11 The indicative layout incorporates deformed rectangular and irregular (informal) perimeter blocks that relate to the alignment of Eastbourne Road and are in keeping with the typical shape of urban blocks within the wider residential area (see Figure 12). Although the perimeter blocks are smaller in area, this reflects a more efficient use of land as a result of smaller rear gardens and is similar to the scale of urban blocks in the successful, high-quality recent development at The Mill.
- 4.12 Consistent with the grain of the wider area, the illustrative layout envisages a fine grain of rectangular residential plots accommodating houses interspersed with medium-sized plots associated with the medical centre and apartment buildings.
- 4.13 As in the wider area, buildings are also positioned to define broadly consistent building lines along streets and are used to define areas of amenity space within the layout. Along Eastbourne Road, a wide grassed verge with a footpath is proposed with a deep setback building line, reflecting the characteristic treatment on the opposite side of the road and consistent with the guidance in NMDC2.¹⁴



Figure 12: Urban grain plan with proposed layout (Source: OS Open Map - Local (2022)); site indicated in orange

14 National Model Design Code, 2021; page 35

Built form

- 4.14 The proposed residential layout has a gross density of around 27.7 dwellings per hectare (dph).¹⁵ It is similar to the medium-range density of the surrounding residential areas which range between 21 dph in the adjacent single storey bungalow development to 24 to 34 dph in the traditional two storey housing estates.¹⁶
- 4.15 The majority of homes proposed in the illustrative layout are detached or semi-detached forms. The former include both narrow fronted types with gables facing towards the streets as well as wide-fronted types. Examples of both are common within the wider context. The proposed semi-detached types include both typical narrow fronted gabled roof types as well as bespoke types that turn the corner of the block. These provide active frontages and natural surveillance along the streets which is good urban design practice. The use of semi-detached and detached forms creates an urban form with small gaps between buildings and is characteristic of the streets within the surrounding area.
- 4.16 The indicative layout also envisages a limited number of apartment block types with linear and L-shaped forms as well as the medical centre. Their footprint and scale is compatible with the built form within the wider surrounding area within which larger footprints and taller built forms are present (e.g. Polegate Care Home, The Sidings, The Mill as well as buildings along Polegate High Street and the existing medical centre at the junction of Eastbourne Road and High Street). The medical centre is sited on the main frontage to Eastbourne Road at the junction into the new development and is set well back. This will contribute to legibility.
- 4.17 The proposed building heights in the illustrative layout range from single storey bungalows and two storey houses to the three-storey medical centre, as shown in Figure 13. Reduced ridge and eaves heights are shown in some locations for semi-detached houses as well the apartment buildings. This approach ties in with the character of the context while making best use of the land by utilising the roof space. The heights envisaged do not exceed those of similar building types in the surrounding area and have been positioned to relate sympathetically to site topography and the scale of adjacent development. The tallest

- apartment building is located at the lowest point of the site to the south, and bungalows and two storey homes with reduced eaves and ridges are situated along the highest points at the northern edges, relating comfortably to the scale of existing adjacent development on Spurway Park and Courtland Road.
- 4.18 There is a clear definition of public and private space within the housing blocks of the illustrative layout consistent with NMDC2.¹⁷ Front gardens of varying depth provide an appropriate sense of transition from the public realm of the street frontage to the private realm of the houses that create defensible space. Private rear garden spaces are also generally contained within the blocks. The apartment buildings are sited to define public space on the frontages and define the edges of blocks with active frontages. A number of these buildings are positioned to terminate views and will contribute to legibility. Areas of communal external amenity space are set well back from the street.
- 4.19 Given the aspiration in the NDG to create compact development forms, walkable places and make best use of land, it is considered that the mix of types and the arrangement of the built form in the illustrative layout would both draw on the character of the surrounding context while creating a well-designed place.¹⁸ The built form envisaged in the illustrative layout would create a relevant and appropriate sense of identity for Polegate and Willingdon, drawing on and respecting the character of the existing context while also following principles of good urban design to shape and adapt to develop an appropriate new character as recommended in NMDC2.¹⁹

15 Design and Access Statement, 2021; page 38
16 Design and Access Statement, 2021; page 14
17 National Model Design Code, 2021; page 32
18 National Design Guide, 2021; page 63
19 National Model Design Code, 2021; para. 120, page 41



Figure 13: Heights/scale plan (Source: Design and Access Statement, OSP Architecture, March 2021)

Appearance, details and materials

- 4.20 While the appearance of the Appeal Scheme is not for determination at this stage, the DAS has included illustrative content that shows a continuation of the use of traditional architecture and materials common to the area, including red brick, render, hanging tiles and tiled roofs. The contemporary use of materials and details is also incorporated, for example through balconies framed in brick with metal and glass balustrades.
- 4.21 The CGIs at Figures 14-17 illustrate the clearly defined entrances visually marked by porches; the interest and layering created by the inclusion of bay windows, dormers and gables and the ordered composition of the facades. They show variety in the roofscape with pitched and hipped roof forms in different orientations that are in keeping with the existing built form of the area. This contrasts with the medical centre adopting a more modern, contemporary approach with a flat roof – signifying its use.
- 4.22 Figure 14 shows the appearance of the flat types with lowered eaves and how these would read in conjunction with the two storey houses as a predominantly two storey building with accommodation within the roofspace, fitting in with the scale and character of the context.
- 4.23 Figure 16 shows an approach to the design of the medical centre and how its form and appearance can help to differentiate its use and contribute to legibility.
- 4.24 The illustrative material shows how the use of materials, the design of roofscapes and various design features could provide layering to create an attractive and visually interesting development, that would have an appropriate sense of place and identity without using pastiche as recommended in WDG (para 6.2).²⁰



Figure 14: Proposed CGI view from centre of the site



Figure 15: Proposed CGI from the eastern boundary of the site



Figure 16: Proposed CGI view from Eastbourne Road



Figure 17: Proposed CGI view along neighbourhood street

Public realm and landscape features

- 4.25 The majority of open space is proposed as a network of linear spaces (shown in Figure 19) that fulfil a number of roles including maintaining the character of the context, creating a buffer zone between the Appeal Site and adjacent development, accommodating walking routes and providing both play and casual open space. The quantum of open space provided in the illustrative layout exceeds the amounts recommended by WDC.²¹
- 4.26 The widened and enhanced verge along Eastbourne Road would provide an attractive buffer between the road and new housing/medical centre, and reflect the broad verges found on the south-western side of the road.
- 4.27 There are additional open areas within the indicative layout that would contribute to the character and identity of the scheme including the sustainable urban drainage provision comprising the swales and attenuation basin along the eastern boundary and main street (Figure 18), as well as smaller areas of amenity planting and street trees in addition to the communal and amenity spaces around the medical centre and apartments.
- 4.28 These would combine with the open space provision to create a spacious and well-landscaped layout. This is in keeping with the general character of the surrounding area which includes verges and small areas of amenity space although the indicative layout accommodates more tree planting along frontages which would provide an enhancement. Although some trees would need to be removed to accommodate the illustrative scheme and access to it, existing trees on the south-eastern and north-western boundaries of the site – including the poplar trees that are prominent in views from the wider area – would be retained²² and supplemented by additional tree planting.²³
- 4.29 The street hierarchy within the indicative layout would create attractive public spaces, as envisaged in NMDC2.²⁴ It envisages various types of movement including shared surface areas, lanes and pedestrian and cycle routes. The streets and spaces envisaged would be safe and overlooked by homes and softened by tree and other planting and swales.



Figure 18: Illustrative view from site's eastern boundary

21 Design and Access Statement, 2021; page 46
22 Arboricultural Impact Assessment and Method Statement, 2021; page 7; Tree Protection Plan
23 Design and Access Statement, 2021; page 30
24 National Model Design Code, 2021; para. 62, page 20



Figure 19: Open Space Areas Plan (Source: Design and Access Statement, OSP Architecture, March 2021)

Sensitivity of the townscape to change

- 4.30 The Appeal Site is surrounded by the urban area of Polegate and Willingdon to the north and west. It is an ordinary townscape of predominantly 20th century housing, interspersed with ancillary community uses. The built form comprises standard house types of varying scale, form and design which reflect the era of their construction and generally lacking in locally distinctive qualities. Features of interest within the area include the characteristic verges, including the broad verge along the historic route of Eastbourne Road and Polegate Windmill. The area has, at best, medium townscape value.
- 4.31 The susceptibility of the surrounding townscape character to change as a result with the proposed development is low. The adjoining streets and buildings are not of any particular historic value or townscape merit. The historic windmill is separated from the Appeal Site by existing housing and the proposed land uses are consistent with the residential character of the area.
- 4.32 The overall sensitivity of the townscape character of the surrounding residential area to change associated with the development of the Appeal Site for housing and a medical centre is low.

Effect on townscape character

- 4.33 The proposed land use is compatible with the adjacent urban area and the intervisibility between the Appeal Scheme and the surrounding area would be limited by the landform, vegetation and buildings. The extent to which the effect of development would be seen within the adjoining townscape character would be limited to changes to the visual context of adjacent streets and would be highly localised. The nature of the change to the existing character of the surrounding townscape would be very low.
- 4.34 The indicative proposals for the Appeal Site also envisage a number of measures that would mitigate effects on the townscape character of the adjacent area. These include maintaining existing trees along the south-eastern boundary and poplar trees, and the visual amenity they provide within a landscape buffer; providing a

broad verge along Eastbourne Road maintaining that positive characteristic; proposing single storey development set well back from the northern boundary and a layout and a form of development that is compatible with the residential character of the context for the reasons set out in the preceding sections.

- 4.35 Overall the effect on the townscape character of surrounding residential area would be negligible.

Whether the scheme is well-designed

- 4.36 Consideration is given to whether the scheme meets the relevant requirements of well-designed places as set out in the NDG in Table 4.1, drawing on the analysis above.
- 4.37 On the basis of the conclusion set out in Table 4.1, it has been found that the Indicative Layout demonstrates that a scheme of the quantum and nature envisaged would deliver a well-designed place.

Table 4.1: Analysis of compliance with the characteristics of well designed places, Lichfields

Characteristic	Conclusions in relation to the Indicative scheme
Context	The preparation of the indicative scheme has been informed by a careful analysis of the context, both in terms of the character of the surroundings and the site specific constraints.
	It would relate well to the surroundings with an appropriate relationship to each boundary including: providing a characteristic broad verge along Eastbourne Road; retaining mature trees within a linear open space to the south-east; setting back development from the north and north-western boundaries and envisaging lower scale development on these edges.
	Positive features of the site have been retained where possible and the indicative layout and design aspirations set out in the DAS has drawn reference from and positively adapted the character of the surrounding area in terms of the layout, built form and architectural character, materials and details noting that it is appropriate to adapt character to suit modern requirements.
Identity	There would be no effect on the significance of heritage assets as confirmed by the HE Desk-Based Study (2021).
	The Indicative Layout and DAS set out an aspiration to create a locally distinctive and legible place by proposing a legible hierarchy of streets, including distinctive building types and spaces and referencing locally distinctive characteristics such as verges, retaining existing trees, varied detached and semi-detached types.
	The introduction of apartment types and tighter urban blocks and plots would provide a greater mix of units and make best use of land consistent with sustainability objectives.
Built form	The CGIs of the indicative layout confirm an aspiration for well-composed residential buildings providing sufficient visual interest in their detailing, layering, roofscape and use of materials set within a high quality public realm with amenity planting and surfacing.
	The indicative layout has a compact form that is walkable and conveniently related to existing facilities including public transport. A legible hierarchy of streets is proposed with clearly defined frontages and memorable buildings and spaces to aid orientation.
Movement	The pattern of streets and blocks is compatible with the character of the surrounding area.
	The movement network would be addressed by residential properties with active frontages providing natural surveillance encouraging social interaction and creating safe streets.
	The indicative layout incorporates footpath and cycle links, including footpath connections to the wider area.
Nature	Green infrastructure is envisaged to be incorporated into the street network including street trees and other amenity planting and swales.
	The indicative layout incorporates existing trees where possible and the verge along Eastbourne Road.
	It envisages a multifunctional network of spaces that provides amenity, biodiversity and water management.
Public spaces	Sufficient amenity space is provided to meet the open space requirements of WDC.
	The street and open space network envisaged in the indicative layout provide a range of public spaces of different scales and types that would be safe and overlooked by adjacent housing.
Uses	Tree and other planting would be incorporated within the public realm.
	The principle of development in this general location is specified in WCS4 under SD4 which identifies “Land at South Polegate and East Willingdon- provision of around 700 dwellings, 8,600 square metres net employment floorspace, leisure, recreation and community facilities”.
	The proposed development would provide a mix of residential types and tenures together with a medical centre.

5.0 Compliance with policy

- 5.1 The Appeal Scheme has been reviewed in relation to the general requirements of the design policy context identified in Section 2.
- 5.2 The suitability of the Appeal Scheme in terms of the form and layout of development presented in the Indicative Layout in relation to the criteria set out in saved policies EN1, EN27, HG5 and HG6 of the WLP, 1998 insofar as they are relevant to the Appeal Scheme, together with guidance in the NPPF, Wealden Design Guide and NDG.
- 5.3 It is noted that should there be matters of concern, those could be dealt with through appropriately worded conditions and through the submission of the detailed design at reserved matters stage.

Response to locally distinctive character

- 5.4 As the proposal is for outline planning permission with all matters except access into the site are reserved, an assessment of the suitability of the design can only be made on whether the indicative layout would deliver a high quality urban design and that the general quantum of built form and open space and the general scale and massing and mix of typologies envisaged in the indicative site layout would be suitable for the context.

Layout, site coverage and density

- 5.5 The pattern of streets, urban blocks and plots defined in the indicative layout are consistent with the shape and arrangement of blocks in the wider area. The residential plots reflect a similar fine grain of broadly rectangular plots for houses with larger plots for community facilities and other forms of residential development such as flats.
- 5.6 The distribution of land uses with the medical centre more prominently located on the Eastbourne Road frontage to assist legibility and lower-scale housing typologies on the northern and north-western boundary with existing single storey housing is acceptable and responds sympathetically to the local context.
- 5.7 As indicated in the DAS, the layout has been informed by factors including solar gain (p54) and introduced elements such as SUDs into an overall landscape framework.

- 5.8 The gross density of 27.7 dph (DAS, p14) is comparable with the range of densities in the surrounding residential area and appropriate for the suburban context. The indicative layout has a slightly more compact form of the blocks and plots than the immediate surroundings however this is consistent with the need to make best use of land. As confirmed in the NDG (para 44) development does not need to copy its context.
- 5.9 It is concluded that the indicative layout demonstrates that a scheme of the mix and quantum of uses proposed can be delivered that meets the requirement of policy ENV1, HSG5, HSG6, WDG and NDG.

Scale and Built form

- 5.10 The built form shown on the indicative layout responds positively to the character of the surrounding area in a number of ways. It uses a range of detached and semi-detached typologies of varying types that are compatible with the range and variety of houses in the surrounding area. The footprint and scale of the apartment buildings and medical centre are also consistent with the built form in the wider surroundings including high quality developments to the north of the railway. The use of lowered eaves heights for flats and house types would serve to reduce the overall scale of these elements and tie in with the predominantly two storey scale of the proposed development. Siting buildings of lower height along the northern edge would provide a successful transition in scale to the existing residential area.
- 5.11 Positioning the medical centre on the lowest part of the site and on the Eastbourne Road frontage would benefit legibility. It would be recognisable due to its use and scale but the lower topography and set back position would enable it to fit comfortably into the street scene, as shown in the Design and Access Statement drawings.²⁵
- 5.12 The proposed generally consistent building alignments along streets, including the set back along Eastbourne Road and the formation of perimeter blocks with clear definition of street frontages is characteristic of the context.
- 5.13 The indicative layout is coherent and well ordered and has a three dimensional built form that would respect the character of the area and draw on positive aspects to reinforce local distinctiveness.

It would be entirely appropriate for its context meeting the requirements of policy EN27 (1).

Design and use of materials

- 5.14 The detailed design approach envisaged in the DAS and the CGI's, although not for determination, demonstrates that the development could deliver a scheme of suitable design and appearance using a palette of characteristic materials that would reinforce local distinctiveness. The indicative proposals would create a well-designed place that would fit in well with the context meeting the requirements of policy EN27, NDG and the WDG.

Landscape

- 5.15 The indicative layout retains where possible trees on and within the site including the south-eastern and north-western boundaries within a broader landscape framework for the development including a range of amenity space and SUDs. It also retains a broad verge along the Eastbourne Road frontage. The retention and incorporation of these features into the layout would help to maintain local distinctiveness. The introduction of swales to form verges on the main street and small spaces addressed by buildings in the layout also reflects the character of the surrounding context.
- 5.16 The indicative layout meets the requirements of EN27 (1), WDG and NDG.
- 5.17 Matters relating to the landscape and visual effect of the scheme are dealt with in the evidence of Mrs Clare Brockhurst.

Design Quality

- 5.18 As set out in Table 1 the Appeal Scheme as envisaged in the Indicative Layout would meet the requirement of well designed places set out in the NDG. The form and layout would also meet the requirements of the WDG.

Amenity

- 5.19 The proposal is in outline and the determination of any future reserved matters applications would ensure that development would have an acceptable relationship to existing residential properties adjoining the site on Spurway Park (nos 32-35 and 40), Brightling Road (39-49) and Courtland Road (nos 1A to 5) in accordance with the requirements of WDG noting that the distances provided can be flexibly interpreted depending on the circumstances.

- 5.20 The indicative layout shows shared surface road, lanes and paths along the edge with associated landscaping. A close boarded fence is shown in the CGIs. Development is set back and oriented to provide overlooking of the street spaces to provide natural surveillance. The indicative layout shows single storey bungalows on the northern edge and dormer bungalows to the north-west. The use of single storey development on this edge, combined with fencing and planting would ensure no overlooking of adjacent private gardens.
- 5.21 The properties on Brightling Road are set well back from the site boundary with long gardens (20m to 40m in length) and 35 and 40 Spurway Park are orientated with their main aspects north-west/ south-east with a secondary aspect facing towards the site. In other places a combination of the fencing and separation would ensure no unacceptable effects on amenity.

National Planning Policy Framework

- 5.22 Specific consideration has been given to how the indicative layout performs in relation relevant sections 11 and 12 of the NPPF. Of the paragraphs set out in the officers report to Committee as being relevant to the scheme paragraphs 124, 126, 130, 131 and 134 are of particular relevance to the consideration of urban design. Analysis of compliance with them is provided in Table 2 on the following page. Where these considerations also overlap with the requirements of policies within the Wealden Local Plan, Wealden Core Strategy, Wealden Design Guide and National Design Guide this is cross referenced.

25 Design and Access Statement, 2021; pages 44-45

Table 5.1: Compliance with National Planning Policy Framework

NPPF Para.	Requirement	Assessment of Appeal Scheme and Indicative Layout	Related local policy and guidance
124 d and e	Make efficient use of land having regard to d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and e) the importance of securing well-designed, attractive and healthy places.	The Appeal Site is identified within an area for development in the Core Strategy and therefore change is envisaged within the adopted policy context. The quantum of development envisaged as shown on the indicative scheme has had regard to the suburban character of the prevailing context and the importance of good design. As set out in the analysis in Section 4 and Table 4.1 there a well designed and attractive place can be delivered with the required level of open space.	WCS4, WDG, NDG, NMDC
126	High quality, beautiful and sustainable buildings and places	The analysis of the appeal scheme in relation to the criteria for well designed places in Table 4.1 above confirms that the indicative scheme would deliver a well-designed place. The corollary of this is that it would also create a high quality and beautiful place. The location of the site is sustainable, adjacent to the existing urban area with good access by foot/cycle to existing public transport, shops and development. As indicated in the DAS, p54 consideration of the sustainability has informed the approach.	EN1, EN27, WDG, NDG, NMDC
130a	Function well and add to the overall quality of the area over the development lifetime	The indicative layout is designed to provide an outlook over existing and proposed streets and spaces providing active frontages, natural surveillance and defensible space. A hierarchy of streets and routes and distinctive building types and forms would work with retained landscape elements within the overall landscape framework to provide legibility and connections to the wider area. It would function well both in itself and in relation to the surrounding area and add to its quality. Suitable urban design, materials and maintenance regimes which can be secured through conditions/ reserved matters details and legal agreement would ensure a place in which design quality would endure.	EN27 (5) NDG
130b	Be visually attractive as a result of good architecture, layout and appropriate and effective landscaping	As set out in preceding sections, the illustrative layout and information provided in the DAS demonstrate the Appeal Site is capable of delivering a development of good architectural quality that has an appropriate layout. The proposed approach to the landscape framework and public realm would provide a visually attractive setting for development that is appropriate for the context.	EN2, EN27, WDG, NDG, NMDC
130c	Be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)	The DAS confirmed, p14, that an analysis of local urban character had informed the built form and layout shown on the illustrative layout. The analysis undertaken in section 4 confirms that the indicative layout draws on positive aspects of local character, addresses the constraints and opportunities presented by this site and its immediate context. It would respect local character with adaptation to deliver a more sustainable and efficient layout. The landscape setting of the scheme is dealt with in the evidence of Mrs Clare Brockhurst.	EN27
130d	Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks.	The potential of the site has been optimised. The indicative layout confirms that the mix and quantum of development together with the requisite amount of amenity space can be comfortably accommodated in a form that is suitable within the local context.	EN1/ NDG/ NMDC
130e	Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.	The indicative layout is based on a perimeter block arrangement with buildings arranged to provide natural surveillance of adjacent streets and open spaces, with clear definition of public and private areas that would deter crime and antisocial behaviour contributing to a safe residential environment. The DAS confirms that the quantum of amenity space shown in the indicative layout exceeds requirements. No amenity issues have been raised by WDC. Single storey dwellings are proposed on the indicative layout to create an acceptable relationship to adjoining housing, with overlooking prevented with overlooking prevented by the separation distance and intervening fencing. The height, materials and details of any boundary treatment can be dealt with by condition.	EN27 (5) / WDG/NDG/ NMDC

Table 5.1: Compliance with National Planning Policy Framework cont.

NPPF Para.	Requirement	Assessment of Appeal Scheme and Indicative Layout	Related local policy and guidance
131	Ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.	The illustrative layout demonstrates that the majority of existing trees on the boundaries of the site can be retained and incorporated into the scheme maintaining the character and amenity that these provide. It indicates that there is the potential for replacement and additional tree planting within streets and spaces throughout the scheme The long term maintenance of new trees would be secured by the conditions proposed to be attached in the SOCG	HG5/NDG
134	Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to: a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.	In this case, the Council prepared a Design Guide for the Borough (dated 2008). While the application is in outline, except for access into the site, the indicative layout demonstrates that the aspirations for high quality design and well designed places can be met by a development of this quantum and form. High design quality can be secured through submission of details and discharge of conditions.	WDG/NDG

Summary

5.23 The assessment of the indicative layout against the urban design policy context confirms that the quantum and form of development proposed in the Appeal Scheme, as envisaged in the indicative layout, can deliver a well designed place that is appropriate for the character surrounding urban area.

6.0 Conclusion

- 6.1 This Design Position Statement has been prepared to provide an independent review of the design matters in connection with the Appeal Scheme. It considers the acceptability of the indicative layout submitted with the application and the general quantum of development proposed in relation to requirements of planning policy and guidance for high quality design and creating well-designed places that would be compatible with the character of the area and maintain local distinctiveness.
- 6.2 Given that Wealden District Council has raised no matters of concern in relation to urban design, the Design Position Statement has focussed on the concerns raised through consultation on the application and appeal by local residents and interest groups. They raise concerns about effects on the identity of the settlement and context, the conservation area, the amount of development, the layout, the lack of green/ recreational space and the effect on surrounding properties.
- 6.3 The urban design assessment of the scheme has been based on a robust analysis of the character of the context, the information submitted with the planning application and the national and local planning policy context.
- 6.4 It found that the indicative scheme demonstrates that a development of 180 homes and a medical centre could be acceptably accommodated within the local context without any material harm to the townscape character of the surrounding area. The indicative scheme responds positively to the local context and demonstrates the potential to reinforce the existing sense of place and identity. There would be no effect on the Church Street Conservation Area which is some distance to the south. The quantum of development proposed can be accommodated together with the required amount of open space. Density levels would be similar to two storey developments in the surrounding area and would not be excessive. Given the outline nature of the proposals, the relationship of the development on the Appeal Site will be determined at a later stage. The indicative scheme and CGIs shows that measures such as fencing, planting, the scale of development and the siting of dwellings can be used to ensure that these relationships do not have an unacceptable effect.
- 6.5 Overall it is considered that the indicative layout would deliver a well designed place that is appropriate for the character surrounding urban area and would comply with local and national and design policy in that regard.



Appendix 1

Townscape assessment criteria and approach

Appendix 1 Townscape assessment criteria and approach

Townscape character assessment

The methodology follows the approach set out in the Guidelines for Landscape and Visual Impact Assessment prepared by the Landscape Institute and Institute of Environmental Management and Assessment, 2013 (GLVIA3). The guidance in the Landscape Institute’s Townscape Character Assessment Technical Information Note 05/2017 Revised April 2018 has also been reviewed.

This study comprises an assessment of the effects on the character and quality of the townscape.

Approach to Townscape Appraisal

Townscape is a product of the interaction between a range of physical characteristics (e.g. topography buildings and landscaping) and human activity (e.g. land use, human culture and history). The assessment of townscape effects requires the existing characteristics, quality and sensitivity of the application site and the surrounding area to be defined to enable an evaluation of the effects of the proposed development on the townscape to be made.

To determine the character of the surrounding urban area, the key characteristics which give the area its distinct sense of place are set out. These are usually positive features but can also be negative in a degraded environment. Key positive characteristics are sensitive receptors that could be directly or indirectly affected by the development.

Compatible with the National Design Guide/ PPG and GLVIA3 para 5.5 the following aspects of townscape character have been reviewed where relevant:

- The context and setting;
- Topography and relationship to built form;
- Historic evolution of the area;
- The urban grain – pattern and scale of streets, blocks, development plots and buildings;
- Land use and activity;
- Movement patterns;
- The scale, mass and form of buildings;
- Building style, details and use of materials including vernacular traditions; and
- The public realm including the role of open spaces, vegetation and water features.

The value of the townscape is established, having regard to any designations and the value of its component parts. It is noted that undesignated townscapes may also have value in their constituent elements and overall character.

The existing townscape quality and value is categorised as high, medium, low or very low, based on the criteria in Table 1.

The susceptibility of the townscape receptors to accommodate change arising from the proposed development is based on factors such as rarity, robustness and consistency based on the criteria at Table 2.

The sensitivity of the townscape to accommodate change is categorised as being high, medium, low or very low by experienced assessors having regard to both to its “value” (table 1) and the susceptibility of the receptors to change (table 2).

The nature (or degree) of change to the townscape receptors (including heritage assets) that arises from the introduction of the development is then predicted, and is defined with reference to the criteria in Table 3.

The assessment considers, at a site-wide and wider area level, the effects of proposals on elements of the townscape that contribute to its character and on the character areas as a whole.

The townscape effects are judged based on a combination of both the sensitivity of the townscape to change and the degree to which the proposed development will effect the townscape. Consideration is then given as to whether effects on receptors are adverse, neutral or beneficial in light of local/other relevant policy objectives. A balanced view is taken in cases where there are both positive and negative changes.

Table 1: Classification of Townscape Value

Classification	Townscape Character
High	Visually coherent groups of well-designed/well-proportioned buildings, well related to streets, spaces and townscape elements, highly distinctive sense of place established over time, may be protected by heritage designation (e.g. conservation area or listing). Few detracting elements.
Medium	Relatively coherent grouping of buildings reasonably well-related to the public realm to create a good although not exceptional sense of place (may include locally listed buildings) - occasional buildings and spaces may lack quality and cohesion.
Low	Largely undistinguished area lacking sense of place and identity, poor spatial definition and generally limited visual interest. Area of emerging character as a result of large scale new development.
Very Low	Poor quality environment lacks cohesive form and structure significant potential for enhancement and very little or no visual interest. Area in a state of development or change in character.

Table 2: Classification of Townscape Receptors to Change

Classification	Susceptibility of Townscape Receptors to Change
High	Rare/ intact area or component of townscape (may be designated) Vulnerable to change - limited potential for change without effect on integrity of feature or area Notable aesthetic/ perceptual qualities or cultural associations that could be adversely affected
Medium	Townscape component or area may be sufficiently robust or frequent to accommodate some changes without affecting integrity Aesthetic/ perceptual qualities may be affected by detracting elements
Low	Robust or frequent component or robust area of townscape Integrity of townscape receptor would be maintained Not vulnerable to change
Very Low	No component within townscape that has any special quality/ interest

Table 3: Classification of Nature of Change to Townscape

Classification	Nature of Change to Townscape
High	Large change/addition to townscape over a wide area or loss/major alteration of key characteristic feature(s).
Medium	Moderate permanent changes in localised area, or partial loss/alterations of characteristic feature(s). Change may include the introduction of prominent new elements which are characteristic/appropriate to the existing townscape.
Low	Change to minor component, feature that is characteristic of the townscape. Introduction of elements which are in character with the existing townscape.
Very Low	Very minor loss or alteration to minor feature / characteristic or virtually imperceptible change in any components / No noticeable change. Maybe very short term or reversible.

