


ATKINS

# Land at Berwick Station

## Proposed Rural Housing Development

Submission to Wealden District Council's
Local Development Framework

June 2008



The site of the former Cuckmere Brickworks

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# written submission



# Introduction

1. In its role as local planning authority, Wealden District Council is in the process of preparing its Local Development Framework (LDF). When complete, the LDF will constitute the new Development Plan for the District and will set out guidance for the development and use of land over the next 20 years.

2. As part of the LDF process, in summer 2007 the District Council undertook consultation on its Core Strategy Issues and Options Consultation Paper which suggested focusing between 70-80% of all new development in and around the towns, with the remainder distributed to villages. One of the issues on which the paper sought views was the merits of a "new settlement option" of the order of 1500-2000 dwellings – 10 broad locations were put forward for such a settlement including an area of search focused on the village of Berwick Station. It is presumed that one of the reasons, if not the main reason, behind the identification of Berwick Station as an area of search is the existence of the railway station which, in transport terms, presents an opportunity to create a very sustainable development.

3. At a meeting of the District Council's Cabinet LDF Sub Committee on 15 October 2007, it was proposed that "all new settlements options be discounted other than those in the Lower Dicker and Golden Cross cluster and Berwick which should be subject to further investigation". In response to that proposal and as the main landowner affected by any major development at Berwick Station, the Trustees of the Firle Estate commissioned Atkins to investigate the potential for a major new settlement focused on the village. As explained below, during the course of the investigation the merits of another option for the development of land within the ownership of the Estate at Berwick Station became apparent – namely, that of a smaller show-piece housing development, much of it on previously-developed land.

4. Following a summary of the findings of the investigation into the potential for new settlement at Berwick Station, this submission to Wealden District Council sets out the case for a smaller show-piece housing development in the village. The submission is made in the spirit of stakeholder involvement in the LDF process, the importance of which is emphasised in the government's Planning Policy Statement on Local Development Frameworks (PPS 12, paras 4.1-4.3) and reiterated in Wealden District Council's Summary Guide to the Core Strategy Issues and Options Consultation Paper which sought (at para 2.2) to elicit the views of "developers and landowners about areas they may wish to see developed over the next 20 years".

# Development Options

5. The investigation undertaken by Atkins into the potential for a new settlement at Berwick Station is summarised on Figures 1 and 2 presented at the end of this document. Supported by an aerial photograph of Berwick Station, a location plan and a photograph looking north towards the village from the South Downs Way, Figure 1 presents an analysis of the main development opportunities (of which the railway station is considered the most significant) and constraints (principally the impact on the Sussex Downs).

6. The existence of the railway station, together with the opportunity to provide more frequent services to Lewes, Brighton and Eastbourne, is described in Figure 1 as the key asset of the potential development area – the value of which is highlighted in the Core Strategy Issues and Options Consultation Paper which points out (at para 6.36) that "all services using the Coastway have significant spare capacity, and the existing service pattern could accommodate significant growth in use". Because of the station and the significant spare capacity on existing rail services, a new settlement at Berwick Station would perform exceptionally well in terms of public transport accessibility.



Land east of Station Road

7. One of the main considerations to be taken into account in any major development at Berwick Station is the effect on views from the South Downs Way which can be taken as a proxy for the impact, in visual terms, on the Sussex Downs AONB and the proposed National Park. In this respect, Figure 1 notes that the land to the south of the railway line is highly visible from the South Downs Way, in contrast to that part of the village north of the line which, largely because of the railway embankment and folds in the land, is more hidden from view (as evident from the photograph in Figure 1 looking north from the South Downs Way).

8. Figure 2 illustrates a potential development concept capable of accommodating about 1000 houses, which is considerably less than the size range for a new settlement put forward in the Core Strategy Issues and Options Consultation Paper (1500-2000 dwellings). By locating all development within 800 metres (10 minutes walking distance) of the station, the scheme makes the best use of the key asset of the potential development area – an approach, however, which inevitably takes in land both north and south of the railway line, with differing degrees of impact as seen from the Downs.

9. The findings of the investigation, as summarised in Figures 1 and 2, were presented to the owner of the Firle Estate (the Gage family) and two planning officers from the District Council at a meeting on site on 19 February 2008. The family expressed deep concern over the implications of development on such a scale, especially with regard to the adverse impact on views from the Downs. As the land on the north side of the railway line is more hidden from view, it was decided to undertake a walk-over survey of that area to identify those parcels of land (if any) which have potential for what the family considered a more appropriate level of development.

10. Three parcels of land, as shown on Figure 3, were identified as having the greatest potential for development:

- The site of the former Cuckmere Brickworks (Site 1) which occupies land alongside the station and which was excluded from the potential development concept illustrated in Figure 2 on the grounds that the regenerating scrub/ woodland was likely to be of some ecological value;

- Land on the opposite side of the road to the station, part occupied by redundant farm buildings, close to the village store and garage (Site 2); and

- The site of another former brickworks alongside a small lake to the south of Ludlay Coppice (Site 3).

11. The idea also emerged during the course of the walk-over survey that any one of the three sites, or a combination thereof, might be the appropriate location for a relatively small show-piece housing scheme. Accordingly, Atkins was commissioned to undertake an ecological assessment of the two former brickworks sites (Sites 1 and 3) to ascertain the presence of any notable habitats and/or species which might constitute a constraint to development. Dependent upon there being no major ecological constraint on development (ie. which could not be satisfactorily mitigated) the commission was to be extended to include an assessment of the case in favour of such a development. Atkins was also commissioned to produce a series of illustrative layouts for the development of the two larger sites (Sites 1 and 2) close to the railway station.



The former Cuckmere Brickworks (Site 1) alongside the railway station



Land close to the village store and garage (Site 2) as also shown on the photograph on the previous page

# Ecological Assessment

12. The ecological assessment of the two former brickworks sites was undertaken by two professional ecologists and comprised a web-based desk study and a walk-over survey undertaken on 8 April 2008. Neither site is designated as a site of nature conservation importance – the nearest being Arlington Reservoir SSSI and ancient woodland at Ludlay Coppice, both in the vicinity of Site 3. Habitats of local ecological value, however, were identified in and around the two sites, principally:

- Three ponds in an area of improved grassland due west of Site 1, one of which was found to contain great crested newts;

- Terrestrial habitat surrounding the three ponds which is considered highly suitable for great crested newts;

- Tussocky grassland in the northern part of Site 1 (Princes Field) which is potentially suitable for reptiles such as grass snake;

- A disused pit with steep earth walls and dense scrub in Site 1 which is potential badger habitat.

13. Within both sites, areas of woodland, dense scrub and hedgerows provide suitable habitat for breeding birds, and some of the trees have potential for roosting bats. The managed hazel woodland at Ludlay Coppice is potentially suitable dormice habitat. Site 3, which adjoins the coppice, contains very little hazel and is considered 'sub-optimal' for dormice but could act as an overspill area supporting a small population on a temporary or permanent basis.

14. Should one or both of the former brickworks be allocated for development in the emerging LDF, and given that only one protected species was confirmed as being present on the two sites, a full desk study followed by further (targeted) surveys would be undertaken. At this stage, it is sufficient to note that neither site is designated as a site of nature conservation importance and that mitigation measures (the nature of which is dependent upon the results of the further surveys) could be put in place to minimise any impact on protected species. Typically, this would include translocation of species such as reptiles and dormice (if found) to suitable 'receptor sites' elsewhere on the Firle Estate. In the case of the great crested newts, mitigation could take the form of a specially protected reserve, embracing the three ponds and surrounding habitat, which could become an educational resource.



The potential nature reserve on land west of Site 1

# The Case in Favour of Development

15. At an average density of about 30 dwellings per hectare net, which is considered appropriate to the character of the area and in line with the 'national indicative minimum' advocated by government, Site 1 is capable of accommodating some 47 dwellings and Site 2 some 44 dwellings. A further 12-15 dwellings could be provided at Site 3, located in such a way as to maximise the design opportunities presented by the small lake. Taken together, therefore, the three sites could accommodate about 100 dwellings.

16. The prospects for the development of a show-piece housing scheme of the scale outlined above are dependent upon the planning policy context, both national and local, within which any proposals will be considered.

## Planning Policy Context

17. Published in 2006, Planning Policy Statement 3 (PPS 3) represents the government's current policy guidance on housing. Working with stakeholders, it advises local planning authorities to set out the criteria to be used for identifying broad locations and specific sites for new housing taking into account, among other factors:

- "The contribution to be made to cutting carbon emissions from focusing new development in locations with good public transport accessibility and/or by means other than the private car";

- "Accessibility of proposed development to existing local community facilities, infrastructure and services, including public transport. The location of housing should facilitate the creation of communities of sufficient size and mix to justify the development of, and sustain, community facilities, infrastructure and services";

- "The need to provide housing in rural areas, not only in market towns and local service centres but also in villages in order to enhance or maintain their sustainability" (para 38).

18. The planning context that is set to emerge from the LDF process is particularly relevant to any assessment of the development potential of the land at Berwick Station. Several of the themes set out in PPS 3 are reflected in the District Council's Core Strategy Issues and Options Consultation Paper:

- "With the acute problems of housing affordability in Wealden's rural areas there was a general acceptance at the 2007 Parish Planning Conference of the need for villages to accept some appropriate and gradual development. This was because of the need to support and reinvigorate local services and communities and make housing more affordable. Aging populations and shrinking household sizes contribute to the deterioration and loss of village amenities; appropriate development may counter this decline and provide opportunities for those who wish to stay in an area" (para 4.28);

- "A concern expressed during community plan consultation and during the parish planning consultation events was that some [settlement] boundaries were drawn too tightly and are preventing small scale housing from being built for local needs" (para 4.2); and on a similar theme

- "Boundaries could be amended to be drawn more broadly to include scope for new development in those settlements considered suitable for some growth" (para 4.5).

19. The issue of the suitability of villages for growth is addressed in Figure 12 of the Consultation Paper. Villages with growth potential are defined as: "Larger local service centres located either within five minutes drive/ 5km of a town or railway station, or having a weekday peak hour (7-9am) bus service. Smaller local services centres will also qualify if they meet two of these transport accessibility criteria. Centres must be suitable for some expansion, infill and redevelopment totalling 50 units or more according to the policy criteria of the new plan."

## Berwick Station: A Village with Growth Potential

20. In accordance with the above criteria and recognising the need (as stated in PPS 3) to provide housing in rural areas "not only in market towns and local service centres but also in villages to enhance or maintain their sustainability" a strong case can be made that Berwick Station qualifies as a village with growth potential. This case, which is presented below, is supported by the District Council's original decision to identify the village as the focal point of an area of search for a new settlement and subsequent proposal that only it and one other location should be subject to further investigation.

## Public Transport Accessibility

21. With respect to public transport accessibility (one of the key determinants of a village with growth potential) the opportunity exists to locate new housing development on land that is within easy walking distance of a railway station – Site 1 is alongside the station and, at its furthest point, Site 2 is less than 350 metres away. This is exactly the type of location which PPS 3 has in mind in urging local planning authorities to consider the contribution to be made to cutting carbon emissions from focusing new housing development in locations with good public transport accessibility, and one which compares very favourably with the suggested criteria of "five minutes drive/5km of a town or railway station" set out in the District Council's Core Strategy Issues and Options Consultation Paper.




The railway station, within a few minutes walk of Sites 1 and 2, presents an opportunity to create a very sustainable development

## Provision of Services

22. The same Consultation Paper comments on the need "to support and reinvigorate local services and communities" – a theme echoed in PPS 3 which refers to "the creation of communities of sufficient size and mix to justify the development of, and sustain, community facilities, infrastructure and services". The provision of new housing at Berwick Station presents an opportunity to support and reinvigorate existing local services and to develop new facilities for the benefit of the community.

23. With respect to existing commercial services, the village contains a post office, foodstore, public house and garage, all of which are in close proximity to the potential development sites and would benefit from the increase in trade that an enlarged population would bring. Similarly, use of the village hall and playing field would increase, along with rail patronage on a line whose services are reported to have significant spare capacity. Although there are no health facilities in the village, information as of June 2008 indicates that there is spare capacity for at least 1550 patients at existing doctors' surgeries in Alfriston, Polegate and Hailsham.

24. Information received from the local Education Authority suggests that the likely increase in demand for primary school places (about 25 pupils for a development of some 100 dwellings) could only be met through the provision of new facilities. According to the Education Authority, Berwick Station (which is located near the junction of three school catchment areas) is most likely to fall within that of Firle CofE Primary School. At present, there are very few surplus spaces at the school, any expansion of which can only take place on adjoining land within the ownership of the Firle Estate. As an integral part of any development at Berwick Station, as outlined in this submission, the Firle Estate is prepared to release a plot of land to facilitate the expansion of Firle CofE Primary School.

25. In addition to land for the primary school and in recognition of the increase in demand for recreational facilities, the Estate is willing to donate to the local community (in perpetuity) the existing playing field alongside the village hall and adjoining land to the north which is suitable for use as a cricket pitch. Again, these facilities would be in close proximity of the potential development sites.



The playing field and adjoining land which would be donated to the local community

## Affordable Housing and the Creation of a Balanced Community

26. The issue of affordable housing or lack of it, in rural areas is well documented. In Wealden, the District Council's Core Strategy Issues and Options Consultation Paper refers to "the acute problems of housing affordability" leading to "a general acceptance at the 2007 Parish Planning Conference of the need for villages to accept some appropriate and gradual development". In recognition of the problem and at a level to be agreed with the District Council, the Firle Estate will agree to make available an appropriate proportion of any development on the land at Berwick Station as affordable housing – with a potential preference that it be earmarked for households who are either current residents or have an existing family or employment connection with the village.

27. On a related matter and with the objective of creating a balanced community, a range of house sizes would be provided rather than an over-concentration on larger-sized units as has happened in past rural housing schemes. Thus a proportion of the total stock would comprise smaller units to help younger people with less equity to live in the area and enable elderly people living in unsuitable dwellings to stay in the locality and (coincidentally) free-up the original property for new occupants.

# Illustrative Housing Layouts

28. Figures 4 and 5 present a series of illustrative layouts for the development of the two larger sites (Sites 1 and 2) both of which are located within easy walking distance of the railway station and existing facilities in the village. Although the accompanying notes to the drawings explain how the scheme responds to its surroundings, all aspects of the design (including the issue as to whether the housing should be of a contemporary or traditional nature) would be the subject of consultation with the District Council and the local community. The overall objective is to create a high quality rural housing development that is a model of best practice.

# Summary

29. Wealden District Council's Core Strategy Issues and Options Consultation Paper issued in summer 2007 sought views on the merits of a new settlement option of the order of 1500-2000 new dwellings. Berwick Station was put forward as one of 10 areas of search for such a settlement and the District Council subsequently proposed that only it and one other location should be subject to further investigation. In response to that proposal and as the main landowner affected by any major development at Berwick Station, the Trustees of the Firle Estate decided to commission an investigation into the potential for a new settlement of the order of 1000 dwellings focused on the village.

30. In order to make the best use of the key asset of the potential development area, the railway station, the investigation concluded that land would have to be developed both north and south of the railway line. It was also noted that any development to the south of the railway line would be highly visible from the Sussex Downs AONB and proposed National Park, in contrast to that part of the village north of the line which is more hidden from view.

31. In February 2008 the findings of the investigation were presented to the owner of the Firle Estate (the Gage family) and two planning officers from the District Council. Although the potential development was considerably smaller than that which was the subject of the District Council's consultation (1000 dwellings compared to 1500-2000) the family considered any such proposals to be unacceptable, principally because of the adverse impact on the Downs.

32. The family considered a small show-piece housing scheme to be a more appropriate level of development and three parcels of land, all on the north side of the railway line, were identified as potentially suitable. Two of the three sites are former brickworks which have become overgrown with regenerating scrub/ woodland. As these two sites were thought likely to be of some nature conservation value, an ecological survey was undertaken to ascertain the presence of any habitats and/or species which might constitute a constraint to development. The survey confirmed the presence of great crested newts in a pond close to one of the sites and found habitat that was suitable (or potentially suitable) for reptiles, badgers, breeding birds, bats and dormice. Should either of the two sites be allocated for development, measures would be put in place to minimise the impact on protected species including the creation of a reserve (for great crested newts) which could become an educational resource.

33. As summarised below, the case in favour of a show-piece housing scheme on the three sites, or a combination thereof, is strong:

- Berwick Station meets the District Council's definition of a village with growth potential, particularly as the two largest sites are within easy walking distance of the station and are capable of accommodating some 47 and 44 dwellings respectively which is in line with the requirement that centres be suitable for expansion, infill and redevelopment totalling 50 units or more;

- Existing commercial services (including the village post office, foodstore, public house and garage) are all within easy walking distance of the potential development sites and would benefit from the increase in trade that an enlarged population would bring;

- Similarly, use of the village hall would increase, along with rail patronage on a line whose services are reported as having significant spare capacity;

- In recognition of the increased demand for services, the Firle Estate is prepared to release a plot of land to facilitate the expansion of Firle CofE Primary School, and to donate the existing playing field to the local community, together with adjoining land suitable for use as a cricket pitch;

- An appropriate proportion of any development would be made available for affordable housing (potentially aimed at households who are either currently resident or have an existing family or employment connection with the village) and a range of house sizes would be provided to help ensure the creation of a balanced community.

34. Although unsuitable on environmental grounds for the development of a major new settlement, the land at Berwick Station presents a unique opportunity to create a show-piece rural housing development in a very sustainable location. Such a development would bring considerable benefits to the local community and is worthy of further consideration during the next stage of the LDF process.

# figures







Location Plan



View looking north from the South Downs Way

## The Environment and Sustainability

The Sussex Downs AONB and the proposed National Park abut the south side of the A27 trunk road.

Land south of the railway line is highly visible from the South Downs Way in the vicinity of the car park at the disused Bopeep Chalk Pit.

Largely because of folds in the land, that part of the village north of the railway line is more hidden from view.

Areas of steep land on the skylines south of the railway line are particularly visible from the Downs.

In the opposite direction, there are magnificent views of the Downs from the land south of the railway line.

North of the village lies a block of Ancient/ Semi-natural Woodland (at Ludlay Coppice) and a Site of Special Scientific Interest/ Local Nature Reserve (at Arlington Reservoir).

The landscape around Ludlay is particularly attractive.

The nearest listed buildings (Ludlay, the barn at Ludlay Farm, Lakeside Farmhouse and Chilverbridge House, all Grade II) lie some distance away from the potential development areas.

All potential development areas lie outside of the indicative floodplain as defined by the Environment Agency.

Regenerating scrub and woodland on the site of the former Cuckmere Brickworks is likely to be of ecological value.

The many watercourses and ditches which drain the land, such as the small stream on the north side of Common Lane and Chilver Bridge Road, are also likely to be of ecological value.

Several public rights of way, including the long distance route, Vanguard Way, cross the land.

## Transport Issues

Not surprisingly, the existence of the station (and the opportunity to provide more frequent services to Lewes, Brighton and Eastbourne) is the key asset of the potential development area.

The station occupies a very constrained site and, other than a nearby area of made-ground on the site of the former brickworks, there is little room for expansion in the absence of property acquisition/ demolition.

Visibility on exiting the station P&D car parks either side of the railway line is poor, any radical improvement of which would require property acquisition.

During the morning peak hour on Tuesday 29 January 2008 (the day of a site visit) the A27 in the vicinity of Berwick Station, including its junctions with Station Road and Common Lane, was operating satisfactorily.

Similarly, no major queues were observed on the A27/A2270 junction near Polegate which is understood to experience peak hour congestion (junction improvements having started in February 2008).

Traffic flows on Station Road and Common Lane were observed to be low.

In the absence of major earthworks (to form a cutting) the steep incline on Station Road south of its junction with Common Lane prohibits any access to adjacent land.

Elsewhere, several locations exist where safe access could be taken from the existing local road network to potential development plots.

Figure 1 - Potential New Settlement: Site Notes

## Rejected Illustrative Concept

A well-designed new community, centred on the existing village and railway station, set within a strong landscape framework close to the foot of the Sussex Downs.

The reason why the concept was rejected is set out above in the written submission (para 9).

## Key Features of the Illustrative Concept

Environmental constraints (topography, visual impact and proximity to the station) suggest a maximum development of about 1000 houses at an average density of about 30 dwellings per hectare net (12 houses per acre).

Strong emphasis on sustainability, particularly:

- the opportunity presented by the station (which would be within 10 minutes walking distance of all residential areas) to reduce car travel;
- the ability to provide a range of community and commercial facilities (including a village school, local shops and health centre) again within 10 minutes walk of all homes;
- the need for all buildings to be energy-efficient, which could be achieved through small-scale renewable technologies such as solar thermal panels and micro-CHP systems.

High quality architecture, sensitive to the gently rolling open countryside of the Low Weald.

A contemporary interpretation of Wealden vernacular architecture (rather than a pastiche) with particular attention, given the sensitivity of long-distance views from the Downs, to the treatment of roofscapes.

Orientation of housing on the south side of the site to take advantage of the magnificent views of the Downs.

Avoidance of development on the skylines south of the railway line.

Woodland planting using species local to the area, along the site boundaries and on the skylines, to break up and filter views especially from the Downs.

Retention of existing woodland, including the regenerating scrub and woodland on the site of the former brickworks which could be managed as 'community woodland'.




Retention of existing watercourses and ditches, which could form part of a sustainable drainage system (in the form of attenuation ponds, wetland areas and reedbeds) and provide opportunities for habitat creation.

Provision of a new road link off Chilver Bridge Road on the east side of the site to access potential development plots, offering an alternative route for traffic which currently uses the minor road through the village (Station Road) as a link between the A27 and the A22 west of Hailsham.

Provision of the new road link road would:

- help relieve traffic queuing on Station Road either side of the level crossing;
- enable public realm improvements to be introduced along Station Road (a half mile section of road with few existing footways);
- potentially require widening of the existing railway underbridge on Chilver Bridge Road to safely accommodate increased traffic flows.

Subject to negotiation with Network Rail and the train operating company, public transport improvements could include:

- improved facilities at the station (such as better sightlines on leaving the two car parks and provision of a passenger drop-off/pick-up point) though, without property acquisition, the scope for major improvements is limited;
- greater frequency of stopping services.

Subject to discussion with the Highway Authority, other infrastructure works would likely include improvements to the junction of Common Lane with the A27(T).

Figure 2 - Potential New Settlement: Illustrative Concept



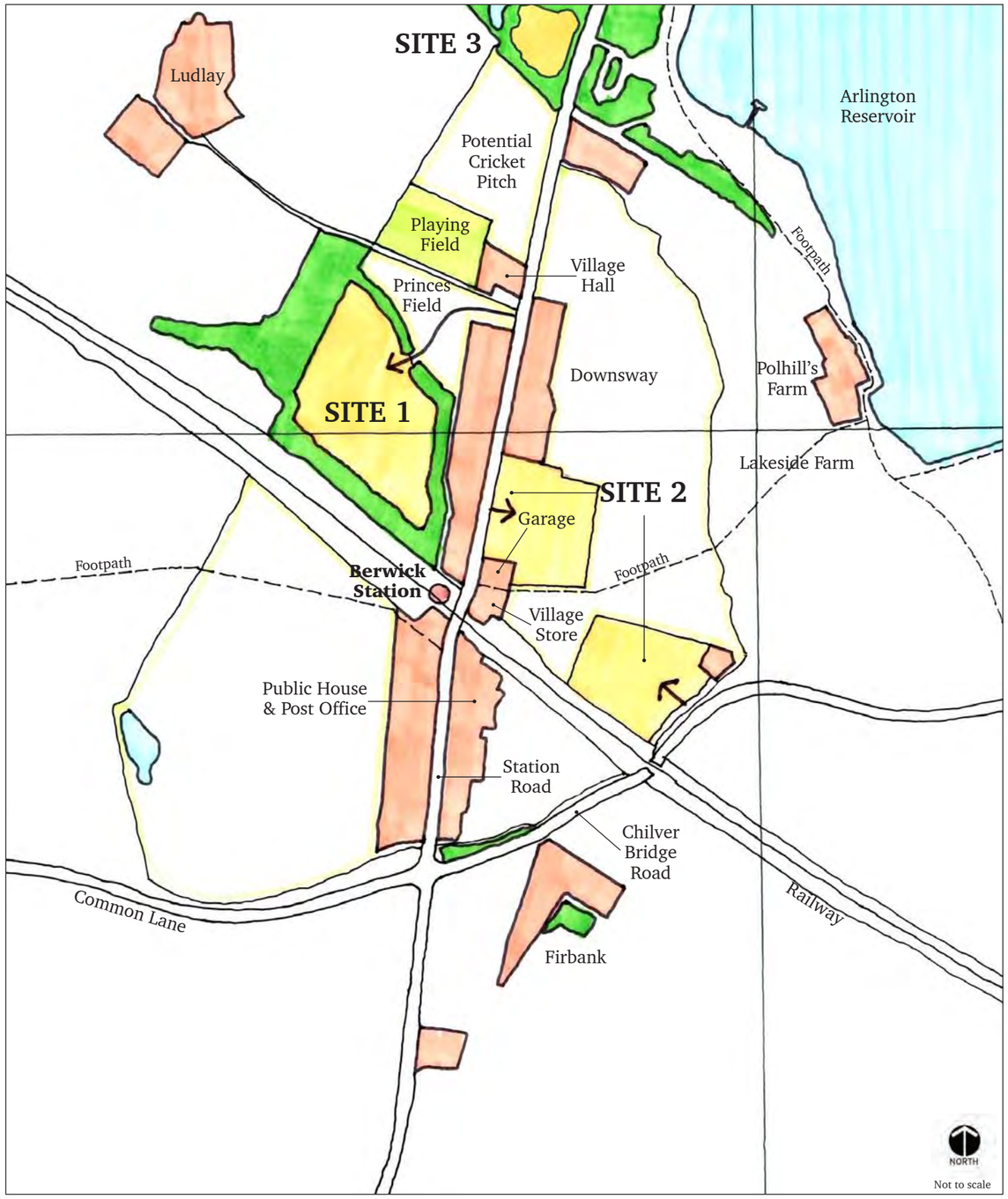




Figure 3 - Show-piece Housing Development: Potential Development Sites

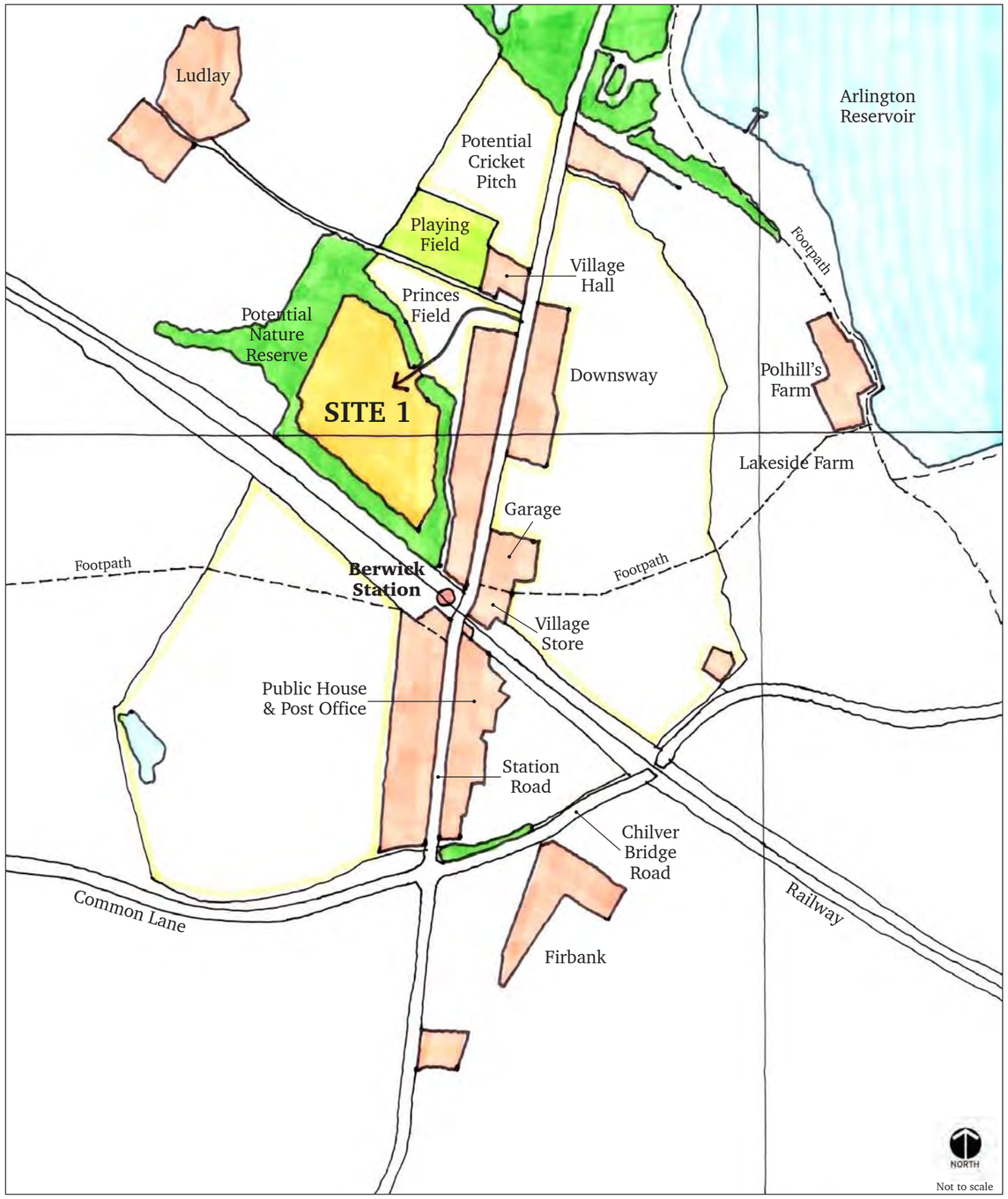



Figure 4 - Show-piece Housing Development: Site 1

Access would be off Station Road.

Pedestrian access to the station could be via the existing footpath along the north side of the railway line.

The new housing would be set within and enclosed by existing woodland.

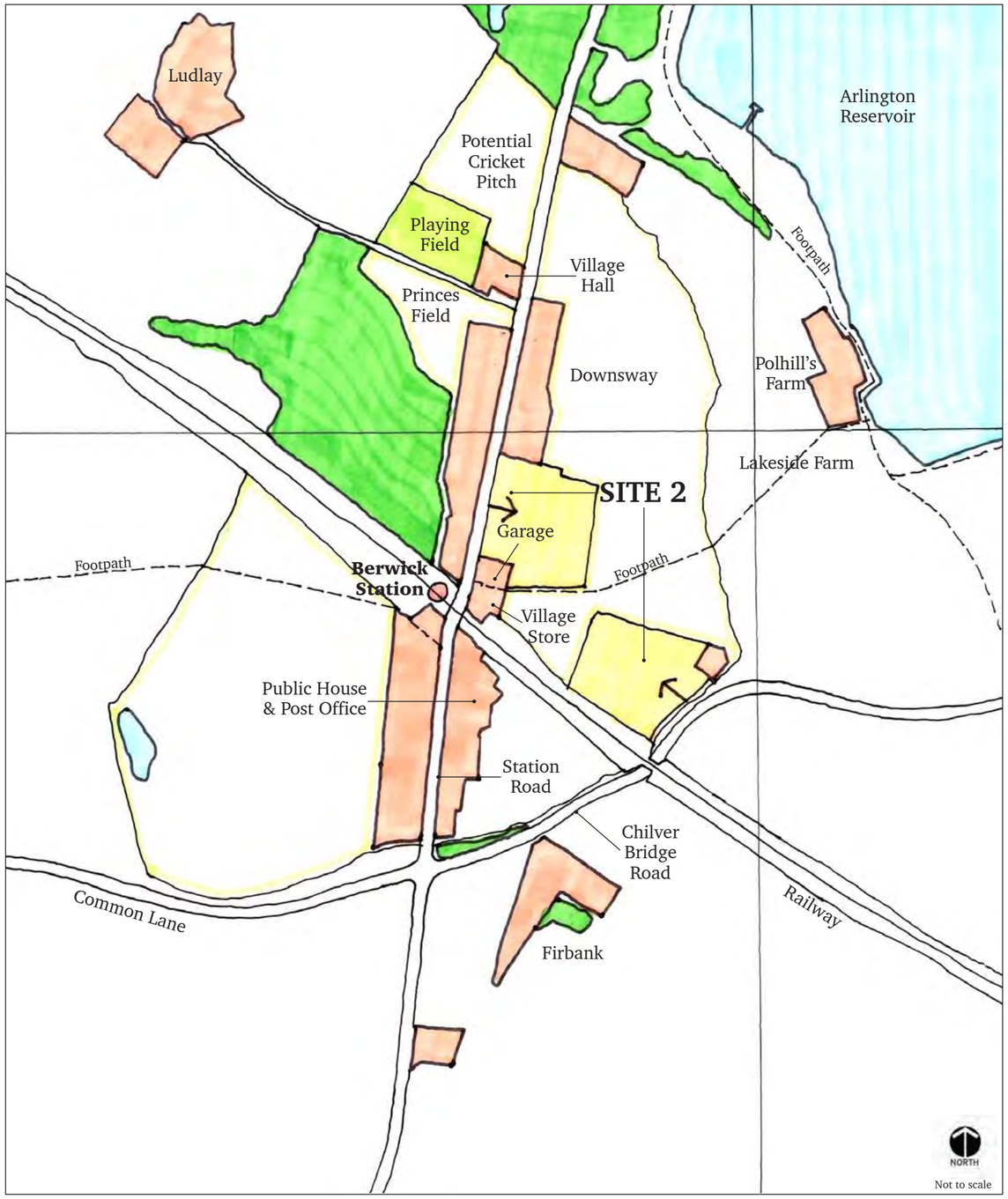
Local materials and construction techniques would be used, as in Firle where split flintstones and red brick trim are used to great effect.

Roof forms would reflect the characteristics of local architecture without degenerating into slavish parody.

All houses would be built in accordance with the government's Code for Sustainable Homes and would take account of the new Planning Policy Statement on climate change.




View looking west showing a mix of semi-detached and detached two-storey houses with single storey linked houses at the corners of courtyards




Not to scale

Access would either be off Station Road or Chilver Bridge Road.

In common with Site 1, all houses would be built to high standards of energy-efficency.

The sketch below illustrates the edge-condition between housing/gardens and the open fields which would be emphasised through use of traditional flint and brick walling.

The existing housing along Station Road is shown to the right of the sketch with their views to open countryside unobstructed by new development – this is underlined by the use of single storey housing at the corners of the plot.

New development would be screened from the existing garage by dense screen planting.







View of the most westerly of the two plots of land which make up Site 2

Figure 5 - Show-piece Housing Development: Site 2