



Planning Statement

Hindsland, Eastbourne Road, Willingdon,
East Sussex

Danescroft (FREOF V Willingdon) LLP



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Project Team

Applicant:



Planning:



Architecture:



Landscape:



Drainage, Noise and, Air Quality:



Highways:



Heritage:



Ecology and Arboriculture:



Ground Investigation:



Community Engagement:



HRA:



EIA:



1. Introduction

Instructions:

- 1.1 Neame Sutton Limited, Chartered Town Planners, is Instructed by Danescroft (FREOF V Willingdon) LLP ("Danescroft") to prepare and submit an Outline Application in relation to land at Hindsland, Eastbourne Road, Willingdon, East Sussex ("the Application Site"), for:

Outline Application All Matters Reserved except for Access (excluding internal estate 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.

- 1.2 This Statement comprises the Planning Statement for the Application and should be read in conjunction with the submitted Application Forms and Certificates, the Design and Access Statement, the pack of Application Plans and the following technical appraisals prepared by the Applicant's design team:

- | | |
|---|--------------|
| • Transport Assessment | i-Transport |
| • Flood Risk Assessment and Drainage Strategy | SMA |
| • Ecology Surveys | Greenspace |
| • Landscape Proposals | ACD |
| • Landscape and Visual Impact Assessment | ACD |
| • Noise and Vibration Assessment | SMA |
| • Air Quality Assessment | SMA |
| • Shadow Habitats Regulations Assessment | Middlemarch |
| • Site Investigation | Discovery CE |
| • Statement of Community Involvement | Marengo |

- | | |
|-----------------------|------------|
| • Tree Survey | Greenspace |
| • Heritage Assessment | Wessex |

- 1.3 In addition to the above schedule of technical appraisals the Application is accompanied by an Environmental Statement, which has been managed by Aecom and contains input on various matters from the design team.
- 1.4 The Environmental Statement has been prepared pursuant to the formal Scoping Opinion provided by the Council on 08 February 2021.
- 1.5 The Applicant has also undertaken extensive pre-application consultation with the local community and other key stakeholders. The detail of the consultation undertaken, the feedback received and, the amendments/responses made by the design team is set out in the Statement of Community Involvement prepared by Marengo Communications and included within the application pack.

Introduction:

- 1.6 This Application comprises an Outline proposal for the development of the Application Site bought forward in accordance with the Strategic Development Location Allocation in the adopted Wealden Core Strategy 2013 that covers the Application Site as well as land to the South East (Morningsmill Farm) and also land to the North West.
- 1.7 Danescroft purchased the freehold for the site in October 2020 and since that time has instructed a multi-disciplinary design team to work on the application proposal.

Pre-Application Discussions:

- 1.8 A series of pre-application meetings (4 in total) have taken place with Officers at Wealden District Council between late 2020 through until early February 2021. The design team has also been in discussion with Officers at the County Council acting in its capacity as Lead Local Flood Authority ("LLFA") and Highway Authority as well as other agencies such as the Environment Agency, Natural England and, Highways England.
- 1.9 The pre-application discussions with Officers have been both positive and proactive and have resulted in an Outline Application Proposal that is supported by a level of detail demonstrating the quantum and form of development proposed can be achieved on the site in an appropriate manner and meeting all relevant Development Management requirements alongside addressing on and offsite constraints.
- 1.10 Full detail of the pre-application discussions that have taken place is set out in the Statement of Community Involvement prepared by Marengo and included in the application pack.

Pre-Application Community Engagement:

- 1.11 Alongside detailed discussions with Officers the Applicant has undertaken pre-application consultation with the local community, local Ward Members, the Parish and Town Councils and local MPs.
- 1.12 Details of the feedback received during the pre-application consultation process and the responses provided and/or amendments made to the draft scheme are also set out in the Statement of Community Involvement.

Environmental Impact Assessment:

- 1.13 As set out in Section 2 below the Application Site forms part of a wider area of land that was the subject of a previous application and appeal for a larger scheme progressed by others. That larger scheme was voluntarily accompanied by an Environmental Statement.
- 1.14 Given the history on the Application Site the Applicant has taken the decision with this scheme to prepare an Environmental Statement, which has been managed by Aecom.
- 1.15 A formal EIA Scoping Request was made via Aecom for this scheme and the Council's EIA Scoping Opinion provided on 08 February 2021.
- 1.16 The Environmental Statement that is submitted with this Application has therefore been prepared in accordance with the Scoping Opinion provided by the Council.

Matters Covered in this Statement:

- 1.17 This Planning Statement deals with the following matters:

• Site History and Description	Section 2
• Description of Application Proposal	Section 3
• Planning Policy Framework	Section 4
• Main planning Considerations	Section 5
• Conclusion and Planning Balance	Section 6

2. Site Description and Planning History

Site Description:

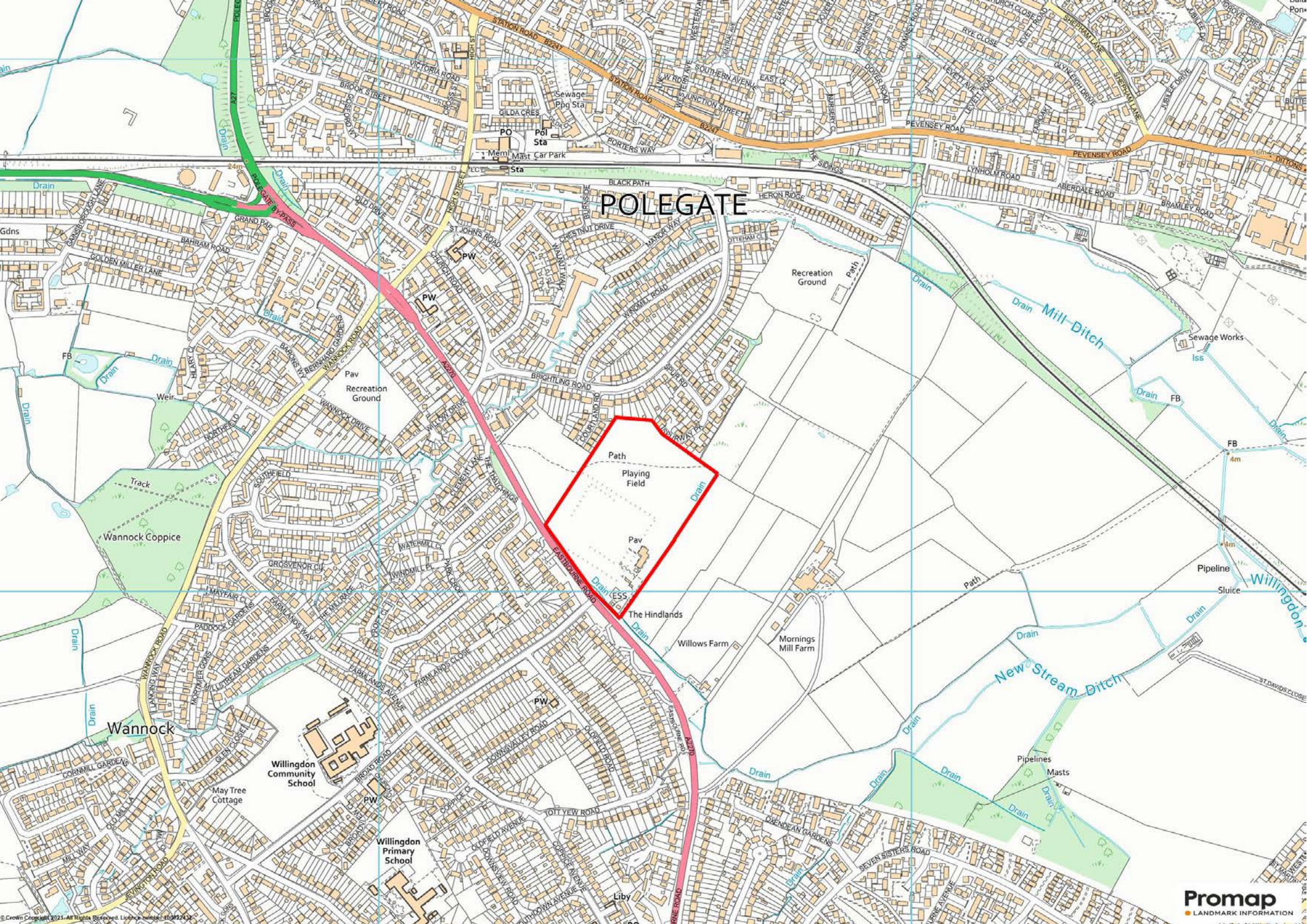
Surrounding Area:

- 2.1
- The Application Site is located adjacent to the settlement of Polegate in East Sussex. Polegate comprises a medium sized settlement that is located immediately to the north of Willingdon and Eastbourne and, in functional terms, comprises part of the wider urban area of Eastbourne.
- 2.2
- The settlement benefits from a good range of local services, facilities, public transport and employment opportunities. In particular the settlement contains the following:
- Railway station
 - Convenience stores
 - Public houses
 - Pharmacy
 - Various take away restaurants
 - Post Office
 - Churches
 - Schools
 - Regular bus services

- 2.3
- In terms of connectivity Polegate Railway Station is located ½ mile from the Application Site's frontage on Eastbourne Road and provides regular services to Brighton, London Victoria and all stations in between.
- 2.4
- A regular bus service operates along Eastbourne Road (hourly) with bus stops immediately adjacent to the site frontage that provides access into Eastbourne.
- 2.5
- Polegate is considered, by the Council, to comprise a suitable and sustainable location for growth.

The Application Site:

- 2.6
- The Application Site itself comprises the former Hindsland Playing Fields, which are understood to have been disused for a period of at least 5 years. When previously in use the playing fields were for private use only and not open to the public. The site is currently overgrown and not maintained as playing fields.
- 2.7
- The Application Site is situated between existing established residential estate development in Polegate to the north and south. The estate development to the north around Brightling Road comprises a mix of bungalows, chalet style bungalows and 2 storey housing of mixed style and age including some more recent infill development (Spurway Park).
- 2.8
- The residential development to the south (on the west side of Eastbourne Road) comprises a mix of bungalows, chalet style bungalows and 2 storey houses again of mixed style and age including more recent infill.
- 2.9
- In terms of topography the area is generally level with a slight slope towards the south. The residential estate development that borders the Application Site's northern boundary is on a level threshold with the site and has limited boundary planting/screening.



POLEGATE

Path
Playing Field
Pav
ESS
The Hindlands

- 2.10 The Application Site's other boundaries are also sparsely vegetated with the highest level of planting/trees/enclosure being along the south eastern boundary. The frontage onto Eastbourne Road is relatively open with good levels of visibility and a large highway verge.
- 2.11 In general terms the Application Site can be characterised as an area of unused former private playing fields with an open frontage onto Eastbourne Road that relates well to the settlement of Polegate and can be easily read as part of the urban area rather than having a rural character.

Planning History:

Development Management History:

- 2.12 The Application Site benefits from previous planning history relating to a larger site including land to the Southeast at Morningsmill Farm.
- 2.13 In 2017 an Outline Application (LPA Ref: WD/2017/1942/MEA) was progressed for the wider site including the Application Site to provide a mixed use scheme in accordance with the extant strategic allocation for the area set out in Policy WCS4 of the adopted Wealden Core Strategy 2013. The core components of the scheme comprised:
- Detail for the access proposals from Eastbourne Road (one point of access through the Appraisal Site and the second further south along Eastbourne Road);
 - Up to 700 no. dwellings including onsite affordable housing (including on the Application Site);
 - 8,600 sq.m of employment floorspace;

- Medical centre (on the Application Site);
- Primary School site;
- Community Centre;
- Retail;
- Playing Fields;
- Children's Play Space;
- Allotments;
- Amenity Open Space; and,
- Pedestrian/cycle connections.

- 2.14 The landuse masterplan for the previous application proposal is shown on the following page.
- 2.15 The scheme progressed on behalf of The Vine Family and University of Brighton was appealed for non-determination and an Inquiry held in October 2019 (PINS Ref: APP/C1435/W/19/3230484). The Appeal was dismissed by decision issued on 13 December 2019.
- 2.16 In dismissing the Appeal the Inspector's sole concern related to her view that the Appeal proposal would give rise to an 'unacceptable' impact on highway safety. The Inspector did not however consider the proposals would amount to a 'severe' impact on the road network in the context of Paragraph 109.



- 2.17 In the detail of her consideration on this matter the Inspector noted that up to 150 no. dwellings could come forward on the site before any works to the Strategic Road Network ("SRN") would need to be completed. Scope therefore existed for a reasonable proportion of dwellings to come forward (21% of the total proposed) before any issue with the SRN would arise. At the local level works would be required to be completed on the Local Road Network ("LRN") prior to any occupation taking place.
- 2.18 The Applicant's Highway Engineer (i-Transport) has subsequently confirmed with the Highway Authority that the quantum of development now proposed in this Application is acceptable in terms of the impact on the SRN and LRN (see Transport Assessment) having regard to both the level of traffic generated by this Application Proposal and cumulatively with other committed and pending schemes in the locality.
- 2.19 Of key importance is the fact the Inspector raised no concerns with the principle of development on the Application site nor the mix and composition of landuses proposed. No other overriding concerns were raised in relation to the scheme presented at Appeal at that time.
- 2.20 There is no other planning history of direct relevance to the determination of this Application on the site.
- 2.21 The Applicant is aware of the current planning application on the Morningsmill site, which has been considered by the Design Team in the preparation of this Application, particularly in relation to cumulative highway impacts.

Development Plan History:

- 2.22 The Application Site has been actively promoted for development in the past and forms part of a wider allocation for a mix of uses in the adopted Wealden Core Strategy 2013 (Policy WCS4 – strategic Development Location 4–SD4). The Allocation is set out in Section 4 below and considered in detail in Section 5 under the heading of principle of development.
- 2.23 The site was then included in the proposed detailed allocation included in the Wealden Strategic Sites Local Plan that was withdrawn in 2015.
- 2.24 The site has therefore been viewed positively by the Council over a considerable period of time for development purposes. Indeed the most recent Strategic Housing and Economic Land Availability Assessment ("SHELAA") (January 2019) also considers the site favourably for housing. The site is identified under reference 180/1510 and is considered suitable, available and, achievable for housing delivering in years 1-5 of the Plan period with an indicative capacity of 126 dwellings.
- 2.25 It is understood that the indicative capacity the Council has identified in the SHEELA is based on an assumed net site area of 4.23ha and a notional density of 30 dpha. The actual site area is 6.46ha (gross) and at a notional density of 30 dpha would generate a capacity of circa 190 no. dwellings.

3. The Application Proposal

3.1 The Application Proposal comprises an Outline Application with all matters reserved except for access (excluding internal estates roads beyond the access to serve the medical Centre) for the following development:

- demolition of existing vacant dwelling;
- Erection of up to 180 no. dwellings;
- Erection of new Medical Centre (2,170 sq.m); and,
- All associated parking, servicing and onsite open space.

3.2 Although the Application Proposal is presented in Outline form sufficient detail has been provided within the Application pack to demonstrate that the scheme can be delivered in a comprehensive manner having regard to the Development Management requirements of the Council and the on and offsite constraints.

The Detailed Component of the Scheme - Access:

3.3 The development will be accessed from Eastbourne Road via a ghost island T-junction arrangement. The access will be constructed to an adoptable standard and will be provided with footways on either side. The access is presented in detail up to and including the internal junction to serve the Medical Centre Plot to enable early commencement of the Medical Centre building.

3.4 Opportunities have also been considered for potential future points of connection into adjoining land should this prove necessary. These connection points are annotated on the illustrative masterplan but are not formally included within the application at this stage.

The Outline Components of the Scheme:

3.5 The proposed Medical Centre plot is located on the Eastbourne Road frontage to the south of the main site access and will be provided as a serviced plot to enable early delivery of the Medical Centre in due course.

3.6 The land to the north of the main site access and further to the north west behind the Medical Centre plot comprises the main residential area and will provide a range of dwelling types, sizes and tenures to meet with the Council's requirements in due course.

3.7 Provision is also made for a network of open space and play space across the site that makes use of existing established mature landscape features and provides a range of opportunity for informal recreation and doorstep play. The illustrative masterplan includes a circulate walking route that runs around the periphery of the site along with a linear trim trail feature on the eastern boundary.

3.8 A comprehensive SUDs drainage system is proposed to manage surface water flows from the site in accordance with the requirements of the LLFA.

3.9 An illustrative landscape masterplan has also been prepared to demonstrate how the scheme could be delivered within a landscape led framework.

- 3.10 With regard to parking and servicing the illustrative masterplan has been tracked to ensure adequate turning and maneuvering space is provided for all vehicle types that will need to access the site.
- 3.11 Parking is provided in accordance with the Council's adopted standards and the Applicant has made provision for electrical vehicle charging points and a car club.
- 3.12 The potential scale of built form has been considered to ensure that the number of dwellings proposed alongside the medical centre can be achieved applying a hierarchy of building heights that begins at the lowest level adjacent to existing bungalows at the north and north eastern extent of the site cascading up to three storeys for the Medical Centre on the Eastbourne Road frontage. The majority of the dwellings proposed would be 2 storey's in height.
- 3.13 Further detail of the illustrative design approach taken is set out in the Design and Access Statement and the illustrative plans/ drawings that are within the Application Pack.





4. Planning Policy Framework

The Development Plan:

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (As Amended) sets out the statutory duty for application proposals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The current Development Plan comprises the adopted Wealden Core Strategy (February 2013), which covers the period 2006 – 2027. The Core Strategy was originally intended as part 1 of a two part Plan with a Strategic Sites Local Plan to be prepared that set out the detail of the proposed strategic allocations identified in the Core Strategy. Unfortunately the Council's Strategic Sites Local Plan failed at Examination and subsequently had to be withdrawn in 2015.
- 4.3 The extant Development Plan is therefore incomplete. The Core Strategy does need to be read alongside the saved policies in the following two extant Development Plan documents:
- Affordable Housing Delivery Local Plan (May 2016)
 - Adopted Wealden Local Plan (December 1998)
- 4.4 The Core Strategy does identify the Application Site in Policy WCS4 (Strategic Development Location 4 – SD4) as forming part of a strategic allocation. This is dealt with in Section 5 below.
- 4.5 The following policies are considered to be of relevance to the determination of this Application Proposal:

Policy	Title
Policy GD1	Development within development boundaries
Policy GD2	Development within development boundaries
Policy EN1	Sustainable Development
Policy EN2	Development Pattern
Policy EN5	Water Resources
Policy EN11	Coastal Levels
Policy EN14	Landscaping within Developments
Policy EN27	Layout and Design of Development
Policy HG5	Dwelling mix within new development schemes
Policy HG6	Crime Prevention in new Housing Developments
Policy HG7	Energy Consideration in New Housing Developments
Policy TR3	Traffic Impact of New Development
Policy TR16	Car Parking Standards
Policy LR1	Provision of Outdoor Playing Space
Policy LR3	Children's Play Space in Developments of 30+ Dwellings
Policy LR5	Informal Amenity Space in New Residential Development
Policy CS3	Willingdon Levels Drainage Catchment Area
Policy CS4	Recycling Enclosures: Residential Development
Policy PW1	Housing Development in Polegate
Policy PW5	Willingdon Levels Recreation Policy Area
Policy WCS1	Provision of Homes and Jobs 2006-2027

Policy WCS2	Distribution of Growth 2006-2027
Policy WCS4	Strategic Development Areas
Policy WCS5	Managing the Release of Housing Land
Policy WCS7	Effective Provision of Infrastructure
Policy WCS12	Biodiversity
Policy WCS14	Presumption in Favour of Sustainable Development
Policy AFH1	Affordable Housing

- 4.6 It is relevant to note that due to the age of many of these policies the weight to be attached to them in the determination of this Application proposal must be balanced with the degree of consistency they have with the NPPF and other factors such as the Council's current 5-year housing land supply. These matters are explored in Section 5 below.

Other Material Considerations - National Policy

- 4.7 The latest version of the National Planning Policy Framework ("NPPF") was published in 2019 and comprises a significant material consideration in the determination of planning applications.
- 4.8 Paragraph 7 sets out the purpose of the planning system as being the contribution to achieving sustainable development. The objective of sustainable development is to meet the needs of the present, without compromising the ability of future generations to meet their needs. In achieving sustainable development, there are three, interdependent objectives: an economic objective; a social objective; and, an environmental objective. Whilst these objectives should be used to guide development towards sustainable solutions, local circumstances should be considered to reflect the character, need and opportunities of each area.

- 4.9 At the core of the Framework is the presumption in favour of sustainable development, where it is advised that plans and decisions should apply the presumption in favour of sustainable development (Paragraph 11). For decision-taking, this means that development proposals should be approved without delay if they are in accordance with an up to date development plan. Where there are no relevant development plan policies, or they are out of date, permission should be granted unless:

(1) The application of policies in the NPPF that protect areas or assets of importance provide clear reason for refusing development;

(2) The adverse impacts of granting permission would significantly or demonstrably outweigh the benefits when assessed against the NPPF as a whole.

- 4.10 Section 4 of the NPPF advises authorities to approach decisions on applications in a positive and creative way and that applications for sustainable development should be approved where possible. Paragraph 39 encourages early engagement to improve the efficiency of the planning application process. This allows many issues to be resolved at pre-application stage, including improvement to infrastructure and affordable housing.
- 4.11 The revised NPPF continues to reinforce the Government's emphasis on significantly boosting the supply of housing and is intended to prompt significant change in the delivery of housing to rectify the housing crisis. The emphasis on the delivery of housing in sustainable locations, such as this Application Site, remains.

- 4.12 Wealden is currently facing a housing delivery crisis and therefore significant weight should be placed on the delivery of new homes in the consideration of any planning application proposal.
- 4.13 In addition to the NPPF the Government has published a series of National Planning Practice Guidance ("NPPG"). The NPPG covers a range of topic headings, the following of which are considered to be of most relevance to this Application Proposal:

Conserving and Enhancing the Historic Environment
Consultation and Pre-Decision Matters
Design
Determining a Planning Application
Flood Risk and Coastal Change
Health and Wellbeing
Housing and Economic Development Needs Assessment
Housing and Economic Land Availability Assessment
Local Plans
Making an Application
Natural Environment
Neighbourhood Planning
Open Space, Sports and Recreation Facilities, PROW and LGS
Planning Obligations
Travel Plans, Transport Assessments and Statements
Tree Preservation Orders and Trees in Conservation Areas
Use of Planning Conditions
Viability
Waste, Water Supply, Wastewater and Water Quality

- 4.14 The NPPG reflects the Government's continuing emphasis on the planning system delivering growth as part of the sustained recovery of the UK economy. The approach in relation to the assessment of housing need and in particular, supply, follows that set out in current, established policy and guidance.

Other Material Considerations - SPDs

- 4.15 In addition to the Development Plan the Council has also produced a Wealden Design Guide SPD (November 2008). Although dated the document is still being applied by the Council and will need to be considered as part of the design evolution of any future planning application proposal.

Other Material Considerations - Emerging Policy

- 4.16 The Council is currently in the early stages of preparing a new Local Plan to replace the adopted Core Strategy and following the withdrawal of the last draft Local Plan in February 2020.
- 4.17 A call for sites exercise was undertaken in August 2020 and the Applicant has submitted the Application Site for consideration in that process.
- 4.18 The Council has also undertaken a first stage Regulation 18 consultation entitled "Direction of Travel", which concluded in January 2021. Neame Sutton has submitted representations in relation to that consultation to further promote the Application site as a sustainable location for housing within the emerging Local Plan.
- 4.19 At the time of preparing this Statement the emerging Local Plan is at such an early stage as to attract no material weight in the determination of this Application.

5. Planning Considerations - The Reasons Why Planning Permission Should be Granted

- 5.1 This section explores the key planning considerations relating to the determination of this Application Proposal and in particular the reasons why planning permission should be granted.

The Principle of Development is Acceptable:

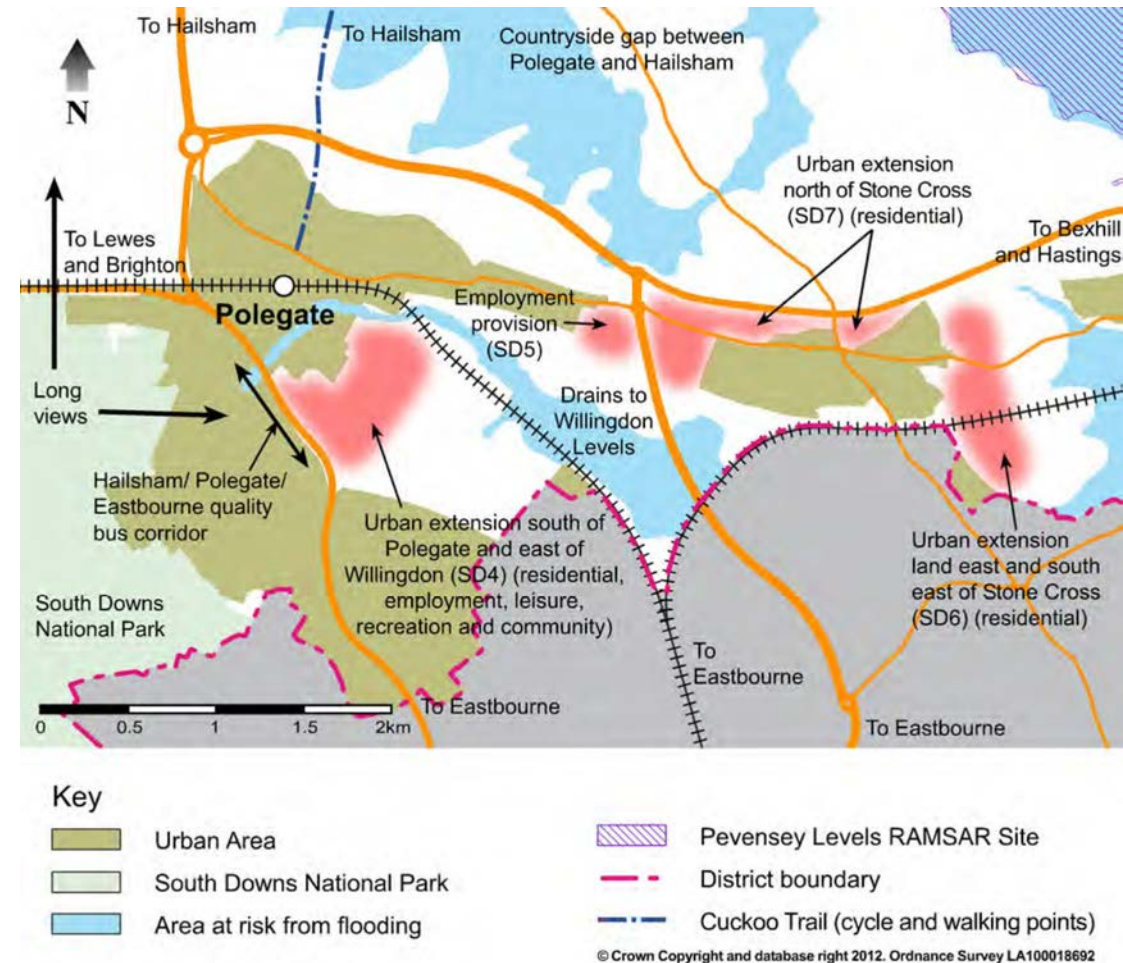
- 5.2 The Application Site is situated in a location that forms part of a wider Strategic Development Location in the adopted Core Strategy 2013 for the following range of uses (Policy WCS4 - Strategic Development Location SD4):

- Around 700 no. dwellings
- 8,600 sq.m of employment floorspace;
- Leisure, recreation and community facilities; and,
- Onsite open space, play space and formal playing pitches.

- 5.3 The Core Strategy was intended, by the Council, to be followed up by a detailed Site Allocations Document. Unfortunately that later plan was withdrawn at Examination.

- 5.4 As a consequence the Core Strategy identifies key headlines in terms of the strategic development location within Policy WCS4 and the supporting text, which is then supplemented by a figure on Page 46 of the Plan (see image to the right).

- 5.5 Taken together it is clear that the Core Strategy identifies the Application Site as part of the strategic development location and that it expects the delivery of residential development along with access from Eastbourne Road.



Extract from adopted Core Strategy - Figure 8 on Page 46.

5.6 Pre-Application discussions with Officers have also confirmed that the principle of development for residential and a medical centre on the site is acceptable and accords with the Core Strategy.

5.7 It is important to highlight that Policy WCS4 does not set out any requirement for the whole strategic development location to be delivered in a single comprehensive application. In other words individual components of the wider area can be bought forward providing they do not prejudice the ability of the whole strategic development location to be delivered, including all of the components identified in Policy WCS4.

5.8 The quantum of residential development set out in the Core Strategy is expressed as 'around' 700 dwellings on the strategic development location. The headline housing requirement for the whole Plan period is correctly identified as a minimum figure (Paragraph 5.3 on Page 25 of the Core Strategy refers).

Housing Land Supply:

5.9 It is relevant to note that the Core Strategy is over 5 years old and as a consequence the Council's assessment of 5-year housing land supply needs to be considered against the Government's Standard Method calculation of Local Housing Need rather than the Core Strategy housing requirement.

5.10 The Council's latest 5-year housing land supply position was published in December 2020 and updated in January 2021 to reflect the 2020 HDT result. The Council's stated position is 3.28 years with a shortfall of -2,529 dwellings, which is significant.

5.11 There is a clear and present need for more housing in the District now. The consequence of the current 5-year housing land supply position is that Paragraph 11 d) of the NPPF 2019 is engaged in the determination of this application i.e. the 'tilted balance'.

Medical Centre Need:

5.12 The allocation for the wider site in the Core Strategy includes a long standing requirement for a new medical centre to be provided.

5.13 Officers have confirmed during pre-application discussions that the Council's preference is for the medical centre to be provided on this Application Site given its close proximity to the existing settlement and direct access onto Eastbourne Road.

5.14 The Applicant has engaged positively with this requirement and is working with a medical centre provider to deliver the new facility on the Application Site at the earliest opportunity. The illustrative layout has been informed by detailed discussions with the provider (and in turn the two GP Practices that will be accommodated) to ensure that the space provision and servicing requirements can be met in full on the site.

5.15 In conclusion on the matter of principle the Application Site is part of an adopted strategic development location allocated in the Core Strategy. The Council has a significant housing land supply shortfall and needs new housing now. The development proposed meets with the requirements of the allocation and the important need for new homes and will deliver the medical centre in the Council's preferred location at an early stage. The principle of development is therefore firmly acceptable on the Application Site.

Appropriate Access Can be Achieved:

- 5.16 In addition to the principle of development the Applicant is seeking detailed consent for the Access to the site including the internal estate road upto the point that is enters the Medical Centre plot.
- 5.17 The detailed access proposals are set out in the Transport Assessment that is prepared by i-Transport that accompanies the application. The Transport Assessment also addresses matters of highway safety and the impact on both the Local Road Network ("LRN") and the Strategic Road Network ("SRN") individually and cumulatively with other committed and pending schemes.
- 5.18 The Transport Assessment has been prepared in consultation with East Sussex County Council acting in its capacity as County Highway Authority as well as engagement with Highways England.
- 5.19 As a consequence the access proposals for the site meet with the requirements of the County Highway Authority and Highways England in relation to both the LRN and SRN.
- 5.20 Particular regard has been had to the HPEMAC proposals for Eastbourne Road and the detailed access layout allows for a modest extension of the HPEMAC across the site frontage within land owned by the Applicant. The Application Proposals therefore not only respect and HPEMAC proposals but allow for its improvement.
- 5.21 In terms of highway capacity the Transport Assessment confirms the traffic generated from the Application Proposal as a whole can be accommodated on the LRN and SRN without giving rise to a severe impact in terms of Paragraph 109 of the NPPF 2019.
- 5.22 Regard has been had to the importance of encouraging future occupiers to reduce their dependency on the private car. The scheme directly connects into the HPEMAC proposals that are themselves designed to provide a high quality bus service, pedestrian and cycle infrastructure. In addition the scheme includes provision for a car club adjacent to the Medical Centre that will be available for all existing and future residents to use.
- 5.23 With regard to car parking and servicing the illustrative masterplan has been tracked to ensure that its highway geometry is appropriate and the correct level of onsite parking is provided, including visitor provision. Secure cycle storage is provided for all dwellings and for the Medical Centre, which also has provision for emergency vehicles.
- 5.24 The access proposals for the site therefore meet with the requirements of the NPPF 2019 and in particular address the concerns raised by the previous Inspector along with the more up-to-date requirements of the County Highway Authority and Highways England.

Matters Reserved for Future Consideration:

Housing Mix:

- 5.25 Despite this application being presented in Outline form the illustrative layout is based on a housing mix and tenure split that meets with the Council's current requirements. In this respect the Application Proposal is fully capable of delivering an appropriate mix of dwelling types and sizes at the Reserved Matters Stage.
- 5.26 In terms of affordable housing the scheme includes onsite provision for 35% affordable housing (63 no. dwellings in total). An indicative housing mix is set out in the Design and Access Statement. The exact mix of dwelling types and sizes will be secured at the Reserved Matters stage.
- 5.27 The scheme is therefore fully capable of delivering a policy compliant housing mix including onsite affordable housing.

Layout and Design Considerations:

- 5.28 The Applicant's architect (OSP) has prepared a comprehensive Design and Access Statement that includes a detailed contextual analysis setting the baseline for the consideration of the site context and the illustrative design approach to be taken.
- 5.29 At this Outline stage it is envisaged that the design approach for the dwellings should be traditional in form with a cascade of scale beginning with single storey properties and moving through chalet style properties to 2-storeys and then to 2 1/2 storeys.

- 5.30 The Medical Centre is presented (illustratively) as a contemporary design comprising a single 3 storey building on the Eastbourne Road frontage. The Medical Centre provider expects to deliver this building to a zero carbon standard utilising modern construction and high performance materials.
- 5.31 The detailed design will of course be a matter for consideration at the Reserved Matters stage but the illustrative approach set out in the Design and Access Statement demonstrates that an appropriate and high quality design solution can be achieved.

Drainage:

- 5.32 The illustrative proposals have been informed by a detailed Flood Risk Assessment and Drainage Strategy, which considers both the onsite drainage requirements for surface and foul flows as well as the offsite impacts particularly in relation to the Pevensey Levels.
- 5.33 The drainage strategy for the site comprises a SUDs system of surface swales and detention basins that allow discharge from the site into the adjacent watercourse at appropriate greenfield runoff rates and allowing for climate change.
- 5.34 Foul flows will be discharged into the sewer network and Southern Water has confirmed it has capacity to accommodate the development proposed within its network and at the nearby treatment works.
- 5.35 The whole site is within flood zone 1 and is not therefore at risk from flooding.
- 5.36 The drainage proposals for the site demonstrate, with a high level of detail, that the development proposed can be accommodated without detriment to the surrounding area in relation to both surface and fluvial flooding and with regard to foul flows. The scheme therefore meets with the requirements of the NPPF 2019.

Ecology:

- 5.37 The Application Proposal is accompanied by a suite of ecology surveys prepared by the Applicant's Ecologist Greenspace.
- 5.38 The survey results confirm that the development can be accommodated without detriment to protected species or their habitat both on and offsite.
- 5.39 Gains can also be achieved in relation to habitat creation/enhancement as part of the development of the site in the manner proposed.
- 5.40 The matter of onsite ecology is not therefore a constraint to development on the site and the scheme accords with the NPPF 2019.

Habitats Regulations Assessment:

- 5.41 Given the proximity of the Application Site to the Pevensey Levels and (to a lesser extent) Ashdown Forest the Applicant's HRA specialist (Middlemarch) has prepared a shadow Habitats Regulations Assessment ("HRA"), which is included as part of the application pack and has been informed by feedback received from Natural England as part of the EIA Scoping process.
- 5.42 The shadow HRA confirms that the development will not give rise to unacceptable impacts on Pevensey Levels. The document also provides the Council with the information that it requires to complete its own HRA as part of the processing of the application.
- 5.43 The matter of ecology in relation to the wider area is not therefore a constraint to development on the site in the manner proposed and the scheme accords with the NPPF 2019 and the Habitats Regulations.

Impact on Trees:

- 5.44 The Application Proposal has been informed by a BS Standard Tree Condition survey undertaken by Greenspace to fully understand the condition, extent and location of all trees on the site including their respective root protection zones.
- 5.45 The majority of existing trees on the site are located around the boundaries (specifically the North West and South East boundaries) and are proposed to be retained and enhanced as part of the proposed development.
- 5.46 Trees are not considered to pose a constraint to development in the manner proposed and the requirements of the BS Standard are met.

Landscape:

- 5.47 The Application Proposals have been informed by a full Landscape and Visual Impact Assessment ("LVIA") prepared by ACD. The proposals are landscape led and ACD has prepared an illustrative landscape masterplan that forms part of the application pack.
- 5.48 The LVIA confirms that the visual impacts arising from the development of the site in the manner proposed are localised in nature and in particular are focused on the change in views from Eastbourne Road (directly adjacent to the site) and from Spurway Park (again immediately adjacent to the site).
- 5.49 Wider views of the site, particularly from the South Downs National Park ("SDNP") are limited and the level of change is modest and can be mitigated by the illustrative planting proposals included as part of the application pack.

5.50 Landscape and visual impact is not therefore a constraint to the development of the site in the manner proposed and a high quality landscape-led scheme can be achieved that will be readily assimilated into the surrounding landscape context.

5.51 The scheme therefore complies with the NPPF 2019 in relation to landscape and visual impacts.

Noise, Vibration and Air Quality:

5.52 The Applicant's noise and air quality consultant SMA has prepared a series of technical reports addressing Noise, Vibration and Air Quality that all form part of the application pack.

5.53 The work undertaken by SMA confirms that the development of the site in the manner proposed can be accommodated without resulting in an unacceptable living environment for future residents in terms of Noise, Vibration and Air Quality.

5.54 With regard to the impact of the development SMA has confirmed that:

'Based on the results of the AQA, it has been concluded that with appropriate mitigation, air quality concentrations are acceptable for future residents of the Proposed Development. Moreover, the impact of development on local sensitive receptors is predicted to be negligible during both construction and operational phases. Therefore, in terms of the planning application, the proposed Eastbourne Road development is acceptable from an air quality perspective.'

'.....the proposed development is in accordance with WHO Guidelines, British Standards, and WDC local policy. Thus, noise should not be a reason for withholding the granting of planning permission for this site.'

5.55 The scheme is therefore acceptable and meets with the requirements of the NPPF 2019.

Historic Environment:

5.56 The Applicant's historic environment consultant (Wessex Archaeology) has undertaken an assessment of the Historic Environment relating to the Application Site, which is included as part of the application pack.

5.57 Wessex Archaeology has concluded in relation to archeology that there are no indications that, if present, archaeological resource within the site would be of such significance to preclude development.

5.58 With regard to above ground assets Wessex Archeology has concluded that:

'Thesettingsassessmentconsideredtheeffectoftheproposeddevelopment upon the Grade II Listed Building Polegate Windmill's significance. The Site lies within the wider rural setting of the windmill. However, this aspect of setting was found to make no meaningful contribution to the ability to appreciate or understand the heritage significance of the asset, which lies primarily in its architectural interest. The assessment concluded that there will be no harm to Polegate Windmill's significance as a result of the development proposals.'*

5.59 Heritage is not therefore considered to comprise a constraint to development in the manner proposed and the scheme meets with the requirements of the NPP 2019 and the Planning (Listed Buildings and Conservation Areas) Act 1990 (As Amended).

Open Space, Sport and Recreation:

5.60 The illustrative masterplan has been prepared on the basis of advice received from Officers alongside the Council's adopted standards in relation to the provision of onsite and offsite open space, sport and recreation space.

5.61 In this respect the illustrative masterplan makes provision for onsite play space and informal amenity greenspace in accordance with the Council's standards. The following provision is identified on the illustrative masterplan:

Space Type:	Amount Provided:	Surplus/Shortfall
Play Space	1,094 sqm	31 sqm
Informal Open Space	6,560 sqm	4,648 sqm

5.62 The above onsite provision exceeds the Council's adopted standards.

5.63 With regard to offsite provision Officers have advised that the Council would expect a scheme of this size i.e. up to 180 no. dwellings to make a financial contribution towards Youth and Adult provision in accordance with the Council's adopted standards. The Youth and Adult contribution addresses the need for formal playing pitches as well as other forms of space such as allotments.

5.64 This approach also accords with the Fields in Trust most recent guidance for Outdoor Sport and Play (November 2020) that seeks onsite provision of children's play space and offsite contribution for formal playing pitches (Table 2 on Page 7 refers).

5.65 The scheme is therefore fully capable of meeting the open space, sport and recreation requirements of the residential development proposed in accordance with the requirements of the NPPF 2019 and the Council's adopted standards.

5.66 With regard to the former use of the site as private playing fields it is important to note that the use ceased over 5 years ago and when the site was in use it was for private purposes only. The pavilion closed in 2001 and there is no evidence of the playing fields being in use from 2004 onwards. The use has effectively been abandoned and the site fallen into disrepair well before the Applicant acquired the freehold interest in the land.

Sustainable Design and Construction:

5.67 Although presented in Outline form the Applicant's sustainability consultant (Briary Energy) has prepared a Sustainability Statement that is included with the Application Pack.

5.68 The Sustainability Statement concludes that:

'The strategy calculates the total CO2 arising from the dwellings and demonstrates that a reduction equating to Building Regulation standards or better can be achieved through improved fabric efficiency measures for the residential dwellings. As for the medical centre on the site other sources will be explored to achieve the zero carbon/ BREEAM excellent standards at the reserved matter stage.'

5.69 The Application Proposals therefore meet with the Government's targets to reduce CO2 emissions and to achieve energy efficient buildings. This approach also accords with the objectives of the Council as expressed in its Climate Emergency Declaration from July 2019.

Planning Obligations Draft Heads of Terms and CIL Compliance:

- 5.70 The Application Proposal comprises CIL Liab development and the appropriate CIL Form 1 has been duly completed and included with the Application Pack.
- 5.71 As a consequence the majority of the offsite infrastructure requirements arising from the development will be addressed via the CIL and in particular education provision that is specifically identified in the Council's adopted Regulation 123 Charging Schedule.
- 5.72 This Application Proposal also has a number of site-specific infrastructure requirements that are to be addressed via a S106 Agreement in due course.
- 5.73 The draft Heads of Terms for the S106 Agreement that are currently envisaged are set out to the right of this page:

Affordable Housing:

- Onsite provision of 35% affordable housing
- Indicative tenure split and mechanisms for delivery of affordable housing

Highway Works:

- Provision of site access works on Eastbourne Road
- Any other contributions/obligations as may be agreed as necessary with the County Highway Authority during the course of the application process

Youth and Adult Open Space:

- Financial contribution in relation to Youth and Adult Open Space, Sport and Recreation in accordance with Council's adopted standards

Landscape and Ecology Management:

- If not addressed by Condition then details to secure onsite Landscape and Ecology Management

SUDS Drainage:

- If not addressed by Condition then details for SUDS Drainage and management of onsite drainage infrastructure

6. Conclusion and Planning Balance

Planning Balance:

- 6.1 This Statement demonstrates that the Application Proposal, which is presented in Outline form with all matters except for access reserved comprises a suitable and sustainable form of development in an appropriate location on an allocated site.
- 6.2 The Application Proposal accords with the relevant requirements of the adopted Development Plan and the NPPF 2019 particularly in relation to the need to significantly boost the supply of housing and to deliver much needed local infrastructure in the form of a new Medical Centre.
- 6.3 The Council's adopted Core Strategy is now over 5 years old and the Council is unable to demonstrate a 5-year housing land supply with a significant deficit amounting to over 2,000 dwellings. In this respect Paragraph 11 d) of the NPPF 2019, the 'tilted balance', is engaged in the determination of this Application Proposal.
- 6.4 The benefits of the scheme are significant and weighty and primarily comprise the following (see table to the right). By contrast the suite of technical appraisals that accompany the application along with the Environmental Statement confirm that any harm arising from the scheme can be appropriately mitigated in accordance with the requirements of the Development Plan and NPPF 2019.
- 6.5 The Planning Balance therefore rests firmly in favour of granting Outline Consent for this Application Proposal in accordance with the Development Plan and NPPF 2019.

Planning Benefits:

- Delivery of 117 no. open market dwellings
- Delivery of 63 no. affordable dwellings (35% of the total)
- Delivery of new Medical Centre
- Provision of extension to HPEMAC
- Onsite open space including play space and Trim Trail
- Landscape and Ecology Enhancement
- Short Term Economic Benefits during Construction
- Long Term Economic Benefits from New Residents and New Homes Bonus
- Delivery of Highly Sustainable Construction, particularly the Zero Carbon Medical Centre
- Provision of Car Club for Use by Existing and New Residents

Conclusion:

- 6.6 This Application Proposal comprises just the type of sustainable and inclusive development that the Government envisages should be delivered as set out in the NPPF 2019. The Council is therefore respectfully requested to grant Outline Consent for the Application Proposal.



Illustrative view into the site from the eastern boundary



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