



SUPPORTING PLANNING STATEMENT

Land at Sunningdale, Sedlescombe

December 2019

SUPPORTING PLANNING STATEMENT

In support of an outline planning application for the
Erection of 9 no dwelling houses and access arrangements with all other matters reserved.

at

**Land at Sunningdale
Off Gregory Walk
The Street
Sedlescombe
East Sussex
TN33 0QB**

On behalf of

Mrs Barkaway and Mrs Harrison

ISSUE DATE / REVISION	COPY REVIEWED BY	DATE COPY HAS BEEN REVIEWED
Supporting Statement (Oct 19)	TB/RH	21.10.19

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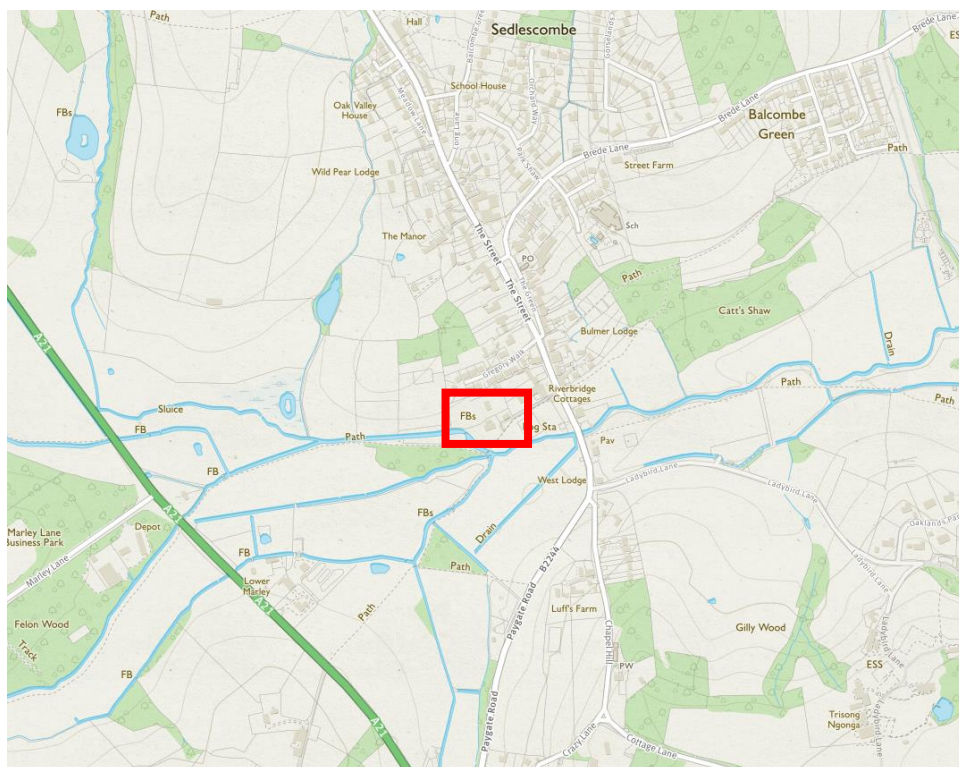
1. Introduction

- 1.1. This statement has been prepared on behalf of Mrs Barkaway and Mrs Harrison in support of an outline planning application for the erection of 9 dwelling houses and access arrangements with all other matters reserved on land at Sunningdale, off Gregory Walk, The Street, Sedlescombe, East Sussex.
- 1.2. The Statement demonstrates an assessment of the context of the site and its surroundings. This includes the physical, social and economic characteristics as well as showing an understanding of the relevant existing planning policies.
- 1.3. The statement should be read in conjunction with the accompanying –
 - Drawing number – 1449 P002
 - Preliminary Ecology Appraisal Statement by KB Ecology
 - Bat Emergence Survey by KB Ecology
 - Reptile Survey by KB Ecology
 - Drainage Strategy by RSPD
 - Arboricultural Survey by Mr O Allpress
 - Affordable Housing Statement at Section 5
- 1.4. It assesses the planning merits of the scheme with regard to any relevant planning history and the applicable planning policy framework.

2. Background Information

Application Site

- 2.1. The surrounding area is characterised by a mixture of suburban residential development and agricultural land.
- 2.2. The application property comprises the detached bungalow property of Sunningdale and its surrounding garden curtilage. The site extends to 0.45 Hectares. The property is located to the south of, and is accessed from, the cul de sac of Gregory Walk. It is within an established residential area with a mix of property styles in the vicinity. The site is located to the west of the main through road, the B2244, which runs north – south through the village.
- 2.3. The site is relatively flat and is well screened by trees and shrubs along the eastern, western and southern boundaries with close boarded fencing making up the majority of the northern boundary.
- 2.4. The river Brede is located to the south of the site and a water main crosses the land in an east – west direction within the southern part of the site. The site is surrounded by residential properties on three sides with the east of the site primarily pasture and woodland blocks.
- 2.5. The property is located a short distance from the centre of the village and close to nearby bus stops. The routes provided offer services to the villages of Hawkhurst, Roberstbridge, Battle and Peasmarsh with regular service to Hastings Town Centre and Bexhill on Sea.
- 2.6. The eastern part of the site is located within the Sedlescombe Development boundary but is not within the Conservation Area. There are no heritage assets located within the site. The site is within the High Weald Area of Outstanding Natural Beauty (AONB).



Locational sustainability

- 2.7. Sedlescombe is a rural settlement 7 miles north of Hastings. The village benefits from local amenities including a local shop with post office, public house, a village hall, primary school and church and is identified in the Core Strategy 2014 as a Local Service Village.
- 2.8. There are nearby bus stops adjacent to and opposite Gregory Walk set along the B2244 with two main routes provided, 349, 360 and 383, and these offer regular services to the villages of Hawkhurst, Bexhill, Roberstbridge, Battle and Peasmarsh with regular service to Hastings Town Centre.
- 2.9. There is a railway station at Battle approx 3km to the west of the site. Battle station gives local rail access to Hastings and Ashford with connections to London Charing Cross.
- 2.10. Paragraph 78 of the National Planning Policy Framework (NPPF), 2019, seeks to promote sustainable development in rural areas. It notes that housing should be located where it will “*enhance or maintain the vitality of rural communities*”. Paragraph 79 seeks to avoid isolated new homes in the countryside.
- 2.11. Due to the location of the site within the village and existing facilities it is not considered that the site is isolated or within an unsustainable location.

Site Constraints

- 2.12. The site is located within the built up area of Sedlescombe and within the Area of Outstanding Natural Beauty but not a Site of Special Scientific Interest.
- 2.13. The Environment Agency (EA) online flood-mapping tool shows the site to be in flood zone 1 (at low risk from flooding). The risk of surface water flooding associated with the site is also categorised as very low by the EA.

Relevant Planning History

- 2.14. Following a review of the planning history on Rother District Council’s online planning register, it is noted that there are no recent relevant planning applications for this site. However, there are some older applications which are outlined below.

- 2.15. Application **RR/96/2328/P** was submitted for the erection of a proposed dwelling and garage within the garden curtilage of the property. This scheme was refused on 12 March 2017 on the basis that it would constitute backland development and would set a precedent for similar development in the area. The development was considered to be out of character with other dwellings in the area.
- 2.16. It would appear from the submitted plans that the dwelling would have been located to the north of the site to remain within the Sedlescombe development boundary at the time. The overall positioning of the unit does appear to be close to the properties within Gregory Walk and is certainly not the ideal solution for such a comparatively large dwelling when taking account of the space available at the site.
- 2.17. The scheme currently being forwarded offers a larger and much more comprehensive redevelopment of the site with a greater mix and offer of housing provision and the associated benefits than just a single dwelling. Since the earlier refusal the site has been considered suitable for development under the Sedlescombe Neighbourhood Plan.
- 2.18. Prior to the above submission and earlier scheme was submitted under **RR/88/0352**. This submission sought outline permission for the erection of 4 no dwellings and associate alterations to the access. The scheme was refused for similar reasons to the previously discussed latter scheme and which referred to backland development, access concerns and that the proposal at the time would not constitute what the Council at that time considered to be ‘infill’ development.
- 2.19. As touched upon previously the scheme was considered within the context of the District and County development plans and the Sedlescombe village plan policies which were relevant at that time. Since this decision was reached much has changed with regards to the policy support for the redevelopment of this site both locally and nationally.
- 2.20. The site is now considered to accord with the relevant policies which would otherwise seek to restrict development and therefore a scheme is submitted on this basis.

Neighbourhood Plan allocation

- 2.21. As mentioned above the site has been allocated within the Sedlescombe Neighbourhood Plan (SNP) 2016 – 2028 (Adopted April 2018) (See **Appendix 1** for relevant pages of the document). The site was thoroughly assessed under the Final Site Assessments Report 2016 (See **Appendix 2** for relevant pages) and was found suitable for development and added to the Land Use Policies contained within the Plan.
- 2.22. Within the Sedlescombe Neighbourhood Plan it is specifically referred to as **Policy 2 – Land at Sunningdale**.
- 2.23. The policy states the following –

The Neighbourhood Plan allocates land for approximately 9, and no fewer than 6, new dwellings on land off Gregory Walk, as shown on the Proposals Map. Development proposals will be supported, provided the scheme:

- 1. makes provision for the retention of the existing dwelling, if practicable, and for 1, 2 and/or 3 bedroom dwellings located entirely within the development boundary of Sedlescombe;***
- 2. is accessed from Gregory Walk;***
- 3. comprises a layout and building orientation that does not harm the amenities of adjoining dwellings by way of overlooking;***
- 4. avoids damaging the habitat of the River Brede and the adjoining river bank and protects the river's wildlife corridors;***
- 5. retains the existing hedges on its boundaries; and***
- 6. implements appropriate restoration to the adjoining River Brede, to the satisfaction of the Environment Agency.***

- 2.24. The subsequent paragraphs of the SNP refer to the reasons for the suitability of the site confirming at para 66 that *'The established settlement pattern of Sedlescombe will be maintained as the proposed site is close to, and a natural extension of, the existing small Gregory Walk development.'* And continuing with *'The site is close to public transport and within a short walking distance of village amenities. The policy makes provision for a range of housing types on the site in accordance to meet the needs of local people.'* We consider that the outline development as proposed fulfills the criterion set out by the SNP and we refer to the specifics contained within the SNP within the more detailed appraisal within Section 7 of this statement.



2.25. The indicative plan has informed the indicative layout of the current submission.

Flood risk designation.

2.26. It is relevant to consider that the site had previously been considered to be within an area of flood risk.

2.27. However, following a challenge and subsequent re-assessment by the Environment Agency the site has been confirmed as within Flood zone 1 and not an area at high risk of potential flooding despite its proximity to the river Brede. At **Appendix 3** we include the confirmation letter dated 31st March 2014 and the corrected flood maps from the Environment Agency.

3. Proposal

- 3.1. Outline planning permission is sought for the erection of 9 dwellings. It is proposed that the development would comprise a mix of dwelling types and sizes with accommodation forwarded as houses of 1, 2, 3 and 4 bedroom units arranged in combinations of semi-detached and detached houses with associated parking and access onto the site.
- 3.2. The existing bungalow dwelling is to be retained and incorporated within the redevelopment of the site. The scheme seeks consideration for means of access only with the matters of appearance; landscaping, layout and scale reserved. The access is via an existing road leading to the village centre and residential areas.
- 3.3. This outline application proposal has been designed to take full account of the local policy, physical constraints, planning history of the site and other similar decisions within the remit of Rother District Council.
- 3.4. Although layout is a reserved matter the indicative plan (See Figure 4 below) demonstrates how 9 no dwellings could be satisfactorily accommodated on the site.



Figure 4 – Indicative layout plan

- 3.5. The details regarding the proposed development and how the layout and design have evolved are set out within the Design and Access section of this statement.
- 3.6. The indicative plan indicates that access can be provided to the east of the roadway from the existing access from Gregory Walk. The scheme is forwarded on the basis that no development would occur over the existing water main and so has been located either side of the road.
- 3.7. The scheme incorporates three two bed dwellings and a four bed unit to the east of the road with a further three detached dwellings to the north as it turns into the site. A detached unit is located to the south of the road at the turning head. A small 1 bed unit has been proposed attached to the existing bungalow and designed to be referenced more as an extension due to its single storey massing.
- 3.8. The indicative site layout has been designed to ensure protection of existing tree and boundary planting and also highlights possible options for landscaping along the boundaries with wildlife corridors along the southern boundary adjacent to the river Brede. This would accord with some of the criteria outlined within the Neighbourhood Plan.
- 3.9. Additionally, we have managed to provide a layout which ensures the existing large Beech tree within the curtilage of Unit 9 is retained.
- 3.10. The layout of the development would ensure that adequate access for service and emergency vehicles can be achieved. In terms of parking considerations, the indicative layout shows how a total of 18 spaces for the development could be implemented, not including garage, and would provide sufficient parking for both residents and visitors.

4. Policy

- 4.1. The proposed development has been considered in accordance with the Rother District Core Strategy 2014, the recently adopted Development and Site Allocations Local Plan 2019 and supplementary planning documents as well as the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).

Policy Framework

- 4.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the requirements of the Development Plan unless material considerations indicate otherwise. This section identifies and appraises the relevant planning policies and refers to any material considerations, which should be taken into account when determining this application.

Development and Site Allocations Local Plan 2019

Policy OVE1: Housing supply and delivery pending plans confirms that -

- 4.3. Housing sites sufficient to meet the Core Strategy requirement of at least 5,700 net additional homes over the period to 2028 will be met by allocations and other provisions in this Plan and Neighbourhood Plans.
- 4.4. The application site is located within a designated area within the Sedlescombe Neighbourhood Plan which now forms part of the adopted overall Development Plan documents for the District.

Policy DGH1: Affordable Housing

- 4.5. This is probably the most relevant Plan policy in respect of the provisioning of affordable housing and coincides with Policies LHN1 and LHN2 contained within the Core Strategy.
- 4.6. Of particular relevance is criterion 5 of the policy where it is stated '*On housing sites or mixed use developments, the Council will expect the following percentages of affordable housing within the district:*

(iv) In the Rural Areas:

(a) In the High Weald Area of Outstanding Natural Beauty, 40% onsite affordable housing on schemes of 6 dwellings or more (or 0.2 hectares or more); or

4.7. *(b) Elsewhere, 40% on-site affordable housing on schemes of 10 or more dwellings (or 0.3 hectares or more).'*

4.8. The applicant is committed to proving a policy compliant level of affordable housing wherever possible as part of this development. However, due to the nature of the application, which is an outline planning application with all matters reserved except for access, the housing mix has not yet been determined. This will be determined as part of a Reserved Matters. This matter is discussed in the Affordable Housing section of the statement below.

DIM2 - Development boundaries.

4.9. New development shall be focused within defined settlement boundaries, principally on already committed and allocated sites, together with other sites where proposals accord with relevant Local Plan policies.

DHG3 – Residential internal space standards

4.10. The Council adopts the Government's nationally-described space standard. All new dwellings (including changes of use and houses converted into flats) should provide adequate minimum internal space in line with the standard.

DHG7 – External residential areas

4.11. An integrated approach to the provision, layout and treatment of external areas of dwellings should be taken in accordance with relevant Core Strategy policies.

4.12. DHG12 – Accesses and drives

4.13. Proposals for new drives and accesses will be supported where:

(i) they are considered acceptable in terms of highway safety, including for pedestrians and cyclists;

(ii) by virtue of their location and design and materials (including any soft landscaping) they would maintain the character of the locality, particularly in the rural areas;

(iii) they involve the relocation of an existing access, if there are highway benefits of relocating the existing access, and the existing access will be stopped up; and

(iv) either, they are constructed of permeable materials, or appropriate drainage is included to manage surface water run-off in accordance with Policy DEN5.

- 4.14. Whilst scheme is in Outline with layout reserved the indicative plans show one way in which the scheme could be implemented and surface water run off can be accommodated in line with the submitted Drainage Strategy.

- 4.15. DEN1 – Maintaining landscape character

The siting, layout and design of development should maintain and reinforce the natural and built landscape character of the area in which it is to be located, based on a clear understanding of the distinctive local landscape characteristics.

- 4.16. DEN2 – High Weald Area of Outstanding Natural Beauty

All development within or affecting the setting of the High Weald AONB shall conserve and seek to enhance its landscape and scenic beauty, having particular regard to the impacts on its character components, as set out in the High Weald AONB Management Plan.

Development within the High Weald AONB should be small-scale, in keeping with the landscape and settlement pattern; major development will be inappropriate except in exceptional circumstances.

- 4.17. It is considered that the site can incorporate a design at the reserved matters stage which would ensure the setting of the High Weald AONB will be conserved and enhanced.

Rother Local Plan Core Strategy 2014

- 4.3 Policy PC1: Presumption in favour of sustainable development states that -

(i) When considering development proposals, a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework will be taken.

(ii) Planning applications that accord with the policies in the Local Plan (and, where relevant, with policies in a Neighbourhood Plan) will be dealt with promptly and approved unless material considerations indicate otherwise. Account will be taken of whether policies are up-to-date, having regard to most recent monitoring information, as well as policies of the National Planning Policy Framework.

- 4.18. The application scheme meets these goals admirably by achieving a high quality sustainable development, and a widened choice in terms of accommodation in this mixed area. The dwellings will be up to modern standards of construction and energy efficiency. The proposal would accord with the neighbourhood plan.

Policy OSS3: Location of development

- 4.19. This policy sets out the criteria for choosing the right sites for development set against a context of sustainable development principles. In assessing the suitability of a particular location for development, when both allocating land for development and determining planning applications, sites and/or proposals should accord with the relevant policies of this Core Strategy and of particular relevance are the following criteria –

(i) The spatial strategy for the particular settlement or area, and its distinct character;

(ii) The capacity of, as well as access to, existing infrastructure and services, and of any planned or necessary improvements to them;

(iii) The local need for affordable housing;

(iv) Needs and priorities identified in approved Local Action Plans;

(v) The low carbon and renewable energy potentials of the site;

(vi) the character and qualities of the landscape;

(vii) Making effective use of land within the main built-up confines of towns and villages, especially previously developed land, consistent with maintaining their character;

(viii) Any constraints relating to land stability, contamination, air quality, agricultural land quality and coastal erosion, and the ability to satisfactorily address these;

(ix) The deliverability of development, including consideration of land ownership patterns and the viability of development;

- 4.20. It is considered that the application site offers an opportunity to comply with each of these criterion in some way. The redevelopment of this site with 9 dwellings would address the social, economic and environmental impacts of development and would contribute to the local economy and community through the creation of much needed housing and would also provide an opportunity to enhance the environment through the creation of a greater ecological offer along the river Brede.

Policy OSS4: General Development Considerations

- 4.21. In addition to considerations set out by other policies, all development should meet the following criteria:

(i) It meets the needs of future occupiers, including providing appropriate amenities and the provision of appropriate means of access for disabled users;

(ii) It does not unreasonably harm the amenities of adjoining properties;

(iii) It respects and does not detract from the character and appearance of the locality;

(iv) It is compatible with both the existing and planned use of adjacent land, and takes full account of previous use of the site;

(v) In respect of residential development, is of a density appropriate to its context, having due regard to the key design principles.

- 4.22. Whilst the details of appearance are not for consideration the principle of the re-use of the site would meet the requirements of this policy.

Policy RA1: Villages

- 4.23. The needs of the rural villages will be addressed by: (v) In order to meet housing needs and ensure the continued vitality of villages, the provision of 1,670 additional dwellings (comprising existing commitments, new allocations and windfalls) in villages over the Plan period 2011 to 2028. This will be located in accordance with Figure 12, subject to refinement in the light of further investigation via the Development and Site Allocations DPD and/or Neighbourhood Plans;

- 4.24. The proposal would remain in accordance with the adopted Neighbourhood Plan and would adhere to the specific criteria of the policy within it.

Policy EN1: Landscape Stewardship –

- 4.25. This says management of the high quality historic, built and natural landscape character is to be achieved by ensuring the protection, and wherever possible enhancement, of the district's nationally designated and locally distinctive landscapes and landscape features.
- 4.26. Relevant aims include the distinctive identified landscape character, ecological features and settlement pattern of the High Weald Area of Outstanding Natural Beauty; Open landscape between clearly defined settlements, including the visual character of settlements, settlement edges and their rural fringes; and Other key landscape features across the district.
- 4.27. Of particular relevance is point (i) as the site sits within the Area of Outstanding Natural Beauty and so should be afforded significant weight when ensuring the most suitable redevelopment scheme.
- 4.28. As discussed previously the proposed scheme would provide an opportunity to enhance the existing plot through the implementation of a suitable style of development which would appear in keeping with other properties within the vicinity of the site.

Policy EN3: Design Quality

- 4.29. New development will be required to be of high design quality by:
- (i) Contributing positively to the character of the site and surroundings, including taking opportunities to improve areas of poor visual character or with poor townscape qualities, and
 - (ii) Demonstrating robust design solutions tested against the following Key Design Principles as appropriate (expanded in Appendix 4), tailored to a thorough and empathetic understanding of the particular site and context

- 4.30. Whilst design and appearance are not for consideration in the current scheme we would seek to ensure that any subsequent reserved matters take design cues from the variety of surrounding properties and encourage a style of development which would reflect the best elements of these.

Policy TR3: Access and New Development

- 4.31. New development should minimise the need to travel and support good access to employment, services and communities facilities, as well as ensure adequate, safe access arrangements. Development will be permitted where mitigation against transport impacts which may arise from that development or cumulatively with other proposals is provided.

- 4.32. This will be achieved through the submission of a transport assessment, transport statement or travel plan, and where it is appropriate through:

(i) Ensuring that new developments in their design and layout prioritise the needs of pedestrians, cyclists and minimise the distance to local public transport nodes;

(ii) Working with the relevant agencies to seek funding for contributions for improvements to local infrastructure needed to facilitate highway capacity and safety and/or public transport accessibility and capacity, where this is necessary to serve the new development; and

(iii) Provision of electric vehicles charging infrastructure.

- 4.33. The proposal, although at the indicative outline stage, is proposing to confirm the use of the existing access. The sites location is close to existing bus transport routes and the provision of electric vehicle charging could be incorporated into any forthcoming scheme.

Policy SRM2: Water Supply and Wastewater Management

- 4.34. This policy asserts that effective management of water resources will be supported by:

(i) Ensuring that the relevant water companies are aware of and have capacity to meet demands for water, wastewater and sewerage arising from new development;

(ii) Ensuring that new development does not have an adverse effect on the water quality and potential yield of water resources, in line with the objectives of the South East River Basin Management Plan, including reference to groundwater ‘source protection zones’;

(iii) The promotion of sustainable drainage systems to control the quantity and rate of run-off as well as to improve water quality wherever practicable, and specifically for all development that creates impermeable surfaces within the hydrological catchment of the Pevensy Levels;

(v) Ensuring that all development incorporates water efficiency measures appropriate to the scale and nature of the use proposed.

- 4.35. In this instance a water main runs through the site and the layout has been designed to ensure that access will remain possible and no development placed above it. The requirement for Sustainable Drainage forms part of the accompanying Drainage Strategy.

High Weald Area of Outstanding Natural Beauty Management Plan 2019-2024

- 4.36. Objective S1 seeks to reconnect settlements, residents and their supporting economic activity with the surrounding countryside. The proposal would provide opportunities for economic activity that supports other land management objectives of the management plan and AONB designations.
- 4.37. Objective S3 seeks to enhance the architectural quality of the High Weald and focusses on the use of local and traditional materials. Further the use of locally sourced materials and an improved and more traditional design would further comply with the plan.

5. Affordable Housing Statement

- 5.1. Rother District Council guidance on Affordable Housing, adopted most recently in the DaSA Local Plan 2019, indicates affordable housing will be sought on sites with 6 or more units in the AONB. The relevant policies from the recently adopted DaSA Local Plan 2019 and the Core Strategy 2014 in respect of Affordable Housing provision are outlined below.
- 5.2. In respect of the Core strategy it is the aim of the Council to provide a mix of housing to meet local need. In this regard para 15.10 of the Core strategy points out that *'Providing smaller dwellings (both market and affordable), as well as more affordable housing, should go some way to provide for this need. It could allow older residents to downsize and stay within villages, as well as provide housing for young people.'* It is proposed that there be a mix of dwelling types along with affordable units within the development to meet the required need.

Policy LHN1: Achieving Mixed and Balanced Communities

- 5.3. This policy refers to the creation of new dwelling houses and considers that in order to support mixed, balanced and sustainable communities, housing developments should:
- (i) Be of a size, type and mix which will reflect both current and projected housing needs within the district and locally;*
 - (ii) In rural areas, provide a mix of housing sizes and types, with at least 30% one and two bedroom dwellings (being mostly 2 bed);*
 - (iv) In larger developments (6+ units), provide housing for a range of differing household types;*
 - (v) In relation to affordable housing, contribute to an overall balance of 65% social/affordable rented and 35% intermediate affordable housing;*
 - (vi) Ensure that affordable housing is integrated with market housing, where practical;*
 - (vii) Provide a proportion of homes to Lifetime Homes Standard.*

- 5.4. The Outline scheme, whilst remaining indicative at this stage and of course subject to potential changes, proposes 9 units at the site and in response to Policy LHN1 would offers a range of unit types which would address the needs within the district and more locally within the village.
- 5.5. It is proposed that the development would comprise a mix of dwelling types and sizes with accommodation forwarded as houses of 1, 2, 3 and 4 bedroom units arranged in combinations of semi-detached and detached houses with associated parking and access onto the site. In this regard the indicative plan identifies a 1 bed unit and 3no 2 bed units which would comply with criteria (ii) of this policy. This is discussed further in Section 8 of this planning statement.
- 5.6. Affordable housing is also proposed and this forms part of the overall vision for the site.

Policy LHN2: Affordable Housing

- 5.7. On housing sites or mixed use developments, the Council will expect the following percentages of affordable housing within the district:
- (iv) In the Rural Areas:*
- (a) 40% on-site affordable housing on schemes of 5 dwellings or more; or*
- (b) A financial contribution, on a sliding scale up to the equivalent of providing 40% affordable housing, in lieu of on-site provision on all residential schemes of less than 5 dwellings.*
- 5.8. The recently adopted DaSA Local Plan 2019 also includes policies which reflect the aims of the Core Strategy.

DaSA Policy DGH1: Affordable Housing

- 5.9. This is the most relevant Plan policy in respect of the provisioning of affordable housing and coincides with Policies LHN1 and LHN2 contained within the Core Strategy.
- 5.10. Of particular relevance is criterion 5 of the policy where it is stated '*On housing sites or mixed use developments, the Council will expect the following percentages of affordable housing within the district:*
- (iv) In the Rural Areas:*

(a) In the High Weald Area of Outstanding Natural Beauty, 40% onsite affordable housing on schemes of 6 dwellings or more (or 0.2 hectares or more); or

(b) Elsewhere, 40% on-site affordable housing on schemes of 10 or more dwellings (or 0.3 hectares or more).'

- 5.11. The current scheme clearly falls within criterion (iv) (a) of Policy DGH1 and as previously discussed it is intended to comply with this requirement.
- 5.12. The applicant is committed to proving a policy compliant level of affordable housing wherever possible as part of this development. However, due to the outline nature of this application, it is not currently possible to secure a specific number of affordable units in this scheme or to confirm the exact unit split that will be provided at this will need to be considered in light of the requirements at the time of the Reserved Matters
- 5.13. Nonetheless, presently we have indicated on the plan that up to 4 no affordable housing units could easily be incorporated within the scheme which would exceed the requirement for rural areas and provide 44% affordable housing. The preamble to this policy confirms that *'Affordable units should be 'pepper potted' individually, or in small clusters.*' (Our emphasis) In this instance, we have indicated on the submitted plan that the units could be located in a small cluster at the eastern end of the site and adjacent to the existing bungalow.
- 5.14. In respect of the specific Core Policies it is anticipated that the development will provide a mix of housing to meet local requirements, including an increased provision for family dwellings as required by Policy LHN1.
- 5.15. Similarly, it is not possible to provide the proposed tenure split at this stage. However, it would be the applicants intention to ensure as near as possible a n35% of the development will provide affordable housing in accordance with Policy LHN2.
- 5.16. In addition, the required tenure split of 65% social / affordable rent and 35% shared ownership will be provided in accordance with Policy LHN1. Affordable housing provision can be secured by a Section 106 Agreement. The delivery of much needed affordable housing is a material consideration.

6. National Planning Policy Framework 2019

- 6.1. In addition to the development plan the Government published the new National Planning Policy Framework (NPPF) in February 2019. The NPPF replaces previous National guidance, sets out the Government's requirements and policies for planning in England and must be taken into account as a material planning consideration. Of particular importance is Annex 1 of the NPPF, which sets out the weight to be afforded to existing development plan policies. Paragraph 213 states that *“existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)”*.
- 6.2. This section of the statement highlights the relevant parts of the NPPF and Council's development plan in respect of this application, along with the weight that should be afforded to the existing adopted policies.
- 6.3. Overall the general thrust of government guidance remains the same, with the presumption in favour of sustainable development being the core objective for the planning system, with the premise that sustainable development should go ahead without delay.
- 6.4. In all respects, the NPPF seeks to maximise opportunities for the supply of housing in appropriate locations, that can contribute towards housing supply, along with maintaining and enhancing the vitality of existing communities. The key objective of sustainable development is expressed within paragraph 7 to be *“meeting the needs of the present without compromising the ability of future generations to meet their own needs”*.
- 6.5. Paragraph 8 refers to the three overarching objectives to sustainable development; namely economic, social and environment, which give rise to the need for the planning system to perform a number of roles:
- contributing to building a strong, responsive and competitive economy, through the right types of development in the right places;

- supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and
- contributing to protecting and enhancing our natural, built and historic environment, including making effective use of land.

6.6. Paragraph 10 details that *“at the heart of the Framework is a presumption in favour of sustainable development”*, with Paragraph 11(b) reiterating that for plan-making this means that *“strategic policies should, as a minimum, provide for objectively assessed needs for housing and other land uses, as well as any needs that cannot be met within neighbouring areas”*, with Paragraph 11 (c) and (d) stating that for decision-taking this means:

- c) *Approving development proposals that accord with the development plan without delay; and*
- d) *Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting planning permission unless:*
 - i. *The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework when taken as a whole.*

6.7. Footnote 7, relevant to paragraph 11(d) is clear that *“this includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites”*. As the Council cannot demonstrate a five-year supply of deliverable housing sites this application should be considered in the context of the presumption in favour of sustainable development.

- 6.8. Paragraph 20 of the NPPF requires strategic policies to set out an overall strategy for the pattern, scale and quality of development and make sufficient provision of housing (amongst others). Footnote 12 clarifies this to be *“in line with the presumption in favour of sustainable development”*.

Delivering a sufficient supply of homes

- 6.9. In respect of housing supply, Paragraph 59 adds further that *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”*. In this regard Paragraph 117 refers specifically to making effective use of land in meeting the need for homes and other uses, with Paragraph 118(d) stating that planning policies and decisions should *“promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained...”*
- 6.10. Paragraph 61 requires that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including but not limited to affordable housing, families with children and older people.
- 6.11. Paragraph 63 considers that *‘provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).’* The scheme would adhere to this.
- 6.12. Paragraph 78 of the NPPF requires Local Planning Authorities to promote sustainable development in rural areas, with housing located where it will enhance or maintain the vitality of rural communities. It notes that *“planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services”*.

Promoting Healthy Communities

- 6.13. Paragraph 91 refers to the importance of the planning system in creating healthy, inclusive communities. It notes that planning policies and decisions should achieve places that promote opportunities for meetings between members of the community such as mixed-use developments, strong neighbourhood centres and active street frontages.
- 6.14. Paragraph 92 notes that to deliver the social, recreational and cultural facilities and services the community needs, planning decisions should plan positively for the provision of shared space, community facilities and other local services to enhance the sustainability of communities and residential environments.
- 6.15. Paragraph 94 states that the government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.

Promoting Sustainable Transport

- 6.16. Paragraph 108 notes that *“in assessing specific applications it should be assured that:*
- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
 - b) safe and suitable access to the site can be achieved for all users; and*
 - c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree”.*
- 6.17. Paragraph 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 6.18. Within this context Paragraph 110 considers that applications should:
- “a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations".

- 6.19. *All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed (Paragraph 111)".* The proposed scheme is not considered to be a major development that would require the provision of a transport assessment.

Making Efficient Use of land

- 6.20. Paragraph 117 states that *"planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions"*.

- 6.21. Paragraph 120 requires decisions to reflect changes in the demand for land. They should be *"informed by regular reviews of both the land allocated for development in plans, and of land availability"*.

- 6.22. Paragraph 122 states that *"planning policies and decisions should support development that makes efficient use of land, taking into account:*

"a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;

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”.

- 6.23. Paragraph 123 recognises that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.

Achieving well designed places

- 6.24. In respect of design, the NPPF identifies that good design is a key aspect to sustainable development (paragraph 124), with Paragraph 127 detailing that planning policies and decisions should ensure developments:

a) Will function well and add to the overall quality of the area;

b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting;

d) Establish or maintain a strong sense of place;

e) Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development; and

f) 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.

Conserving and Enhancing the Natural Environment

- 6.25. Section 15 of the NPPF relates to conserving and enhancing the natural environment.

6.26. Paragraph 170 states that decisions should contribute to and enhance the natural and local environment by:

“a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate”.

6.27. Paragraph 175 states that when determining planning applications, local planning authorities should apply the following principles;

a) “if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged,

- 6.28. The NPPF requires Local Planning Authority's to approach decision-taking in a positive way, encouraging decision-takers to approve applications for sustainable development where possible (paragraph 38).
- 6.29. Paragraph 55 of the NPPF advises that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.
- 6.30. The NPPF sends out a very clear message that the Government considers planning to play a vital role in building our economy and encouraging growth in both urban and other areas and that significant weight should be attached to the advice set out within it. This planning application fully accords within advice set out in the Framework, on the basis that it complies with the presumption in favour of sustainable development, which makes it clear that where relevant policies in the development plan are out of date, planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework as a whole and unless specific policies in the Framework indicate development should be restricted.

7. Design and Access Statement

Surrounding context and development

- 7.1. As a settlement, Sedlescombe has a predominantly historic setting with a range of property types and designs forming an archetypal 'Sussex' vernacular which has evolved over a number of centuries. More recent developments along Brede Lane and including the neighbouring Gregory Walk development were constructed in the latter half of the 20th Century.
- 7.2. The dwellings which make up the village as it appears today comprise a number of forms ranging from bungalows to chalet bungalows, two-storey traditional dwellings and a number of heritage assets and listed buildings along the Street. A wide range of materials have been used on the existing housing stock, so it could be said that that there is no overriding architectural style that can be favoured.
- 7.3. That being said the immediate area is fairly typical of the more modern wider settlement character. The adjoining dwellings within the immediate vicinity of the site range from single storey bungalows or chalet bungalows (adjoining Gregory Walk) to the two-storey buildings (to the east and south of the site). Most of the buildings are detached, although there is an element of terraced and semi-detached properties within the immediate vicinity.
- 7.4. The following photographs highlight the variety of dwellings in the immediate vicinity of the site including various external finishes and architectural detailing that provides the variation in appearances of these dwellings.



Figure 4 – Image of bungalows and chalet bungalow style dwellings along Gregory Walk to the north of the site



7.5. Figure 5 – Image of a grouping of two storey detached and semi-detached dwellings set to the south of Gregory Walk and to the east of the application site.



Figure 7 - Image of large two storey properties opposite the entrance to Gregory Walk and located along the Street.



Figure 8 – Image of two storey semi-detached dwellings recently erected and fronting the highway of the Street farther to the north of the site.

- 7.6. The National Planning Policy Guidance (NPPG) sets out that: *“A Design and Access Statement is a concise report accompanying certain applications for planning permission and applications for listed building consent. They provide a framework for applicants to explain how the proposed development is a suitable response to the site and its setting, and demonstrate that it can be adequately accessed by prospective users. ... The level of detail in a Design and Access Statement should be proportionate to the complexity of the application, but should not be long.”*
- 7.7. The NPPG also contains specific guidance in relation to outline planning applications: *“Information about the proposed use or uses, and the amount of development proposed for each use, is necessary to allow consideration of an application for outline planning permission. Under article 4(5) of the Development Management Procedure Order, an application for outline planning permission must also indicate the area or areas where access points to the development will be situated, even if access has been reserved.”*
- 7.8. As outlined in section 2 of this statement, the following matters are reserved, layout, scale, appearance and landscaping. Reserved Matters may be described as:
- Appearance: Aspects of a building or place which affect the way it looks, including the exterior of the development;
 - Scale: Includes information on the size of the development, including the height, width and length of each proposed building
 - Landscape: The improvement or protection of the amenities of the Site and the surrounding area, this could include planting trees or hedges as a screen; and
 - Layout: Includes buildings, routes, parking and open spaces within the development and the way they are laid out in relation to buildings and the spaces outside the development.
- 7.9. Following the above points and guidance, this statement is structured below and takes account of the reserved matters.

Use

- 7.10. The proposal is for the construction of a larger number of affordable and family dwellings on land which has historically been used as residential garden. The proposed use would be in keeping with the existing residential uses adjacent to the site.
- 7.11. The site sits comfortably within a surrounding built up area and in view of the anomalous size of the existing curtilage is an obvious location for development.

Amount

- 7.12. The application is in outline form and the layout plan demonstrates how a residential development could provide 9 dwellings at this site in a manner which reflects the character and spacing of dwellings within the vicinity. The layout outlined generates 9 dwellings and the proposed mix is considered to constitute an appropriately-scaled residential growth within the area.

Layout

- 7.13. The indicative layout has evolved following the findings of the accompanying Tree and Drainage surveys combined with the landscape features of the site.
- 7.14. The most agreeable solution when considering a layout was to replicate where possible the indicative layout forwarded in the Final Site Assessment Report 2016. This was because the identified layout of the site focusses the built form away from the water pipe and still works very well.
- 7.15. However, unlike the indicative plan submitted in the 2016 report in this instance it was felt the positioning of 2 no dwellings to the south of the roadway and water main would not be achievable given the requirement of the SUDS attenuation pond which is needed at the lower portions of the site. We have therefore chosen to include only a single dwelling to the south of the road and to focus on an area for potential biodiversity and planting improvements at this part of the site too.

- 7.16. The indicative plan and associated survey provided with the application details a viable potential layout for the site. The plan demonstrates that 9 dwellings can be accommodated which ensures that the area of land closest to the river Brede and the wildlife corridor without any unacceptable impacts on neighbouring properties, tree boundaries of the site, or the wider area. The plan also identifies that vehicles will also be able to manoeuvre through the site adequately and safely.

Scale

- 7.17. Although a reserved matter the indicative plans show that two rows of properties could be accommodated on the site. Two-storey dwellings could be accommodated at the site due to the separation distance between dwellings surrounding the site.
- 7.18. The height, bulk and mass together with the use of similar materials all ensure the proposals would not appear visually harmful to the street scene or character of the area.

Landscaping

- 7.19. Detailed considerations for landscaping remain to be determined as part of a subsequent planning application which includes details of the reserved matters stage. However, the following features are suggested by the indicative layout:
- Retention and enhancement of vegetation along the boundaries of the site;
 - Retention of existing mature trees along the boundaries;
 - Areas of open and garden space; and
 - Permeable areas for incorporation into Sustainable Urban Drainage Systems (SUDs).
- 7.20. New planting and landscaping would provide an opportunity to enhance the sylvan character of the area.

Appearance

- 7.21. Although also a reserved matter, the principles to be adopted in regard to appearance aim to ensure the development will form an identifiable neighbourhood with the arrangement and design of the buildings being sympathetic to the p[re]dominant styles and character of the area.

Access

- 7.22. It is proposed to use the existing Access from Gregory Walk to serve the proposed dwellings. It is anticipated that the highway department will accept the proposal based upon the previous comments which formed part of the Final Site Assessment Report in 2016 at Section 16.1, p81 (See **Appendix 4**)

8. Planning Considerations

- 8.1. This Planning Statement sets out a comprehensively considered justification for the development of the Site, taking account of all relevant planning and material considerations. A principal (if not the principal) benefit is the substantial provision of up to 9 new homes on an eminently sustainable site that is available now to meet a variety of evident housing needs and to make a very significant contribution to the current shortfall in the Council's housing supply and delivery.
- 8.2. The issues to be determined in this application are whether the principle of redeveloping the site is acceptable and whether the proposed access arrangement, which is the only matter for full determination sought by the Outline application, is adequate and would not prejudice highway safety. The site layout plan and elevations that have been submitted are for illustrative purposes only.
- 8.3. The relevant planning considerations may be summarised as follows:
- Principle of Housing Development;
 - Neighbourhood Plan allocation
 - Housing Mix
 - Landscape and Visual Impact;
 - Residential Impact
 - Living conditions for future occupiers
 - Transport and Highways;
 - Heritage Impacts
 - Flood Risk and Drainage
 - Ecology and Biodiversity
 - Impact on Trees
 - Bin storage
 - Contamination

Principle of development

- 8.4. Housing is a priority use for all Local Planning Authorities. Policy OSS3 (vii) supports making effective use of land within the main built-up confines of towns and villages, especially previously developed land, consistent with maintaining their character. Policy generally encourages the provision of redevelopment in previously developed residential areas provided that it is designed to complement the character of surrounding developments, the design and layout make suitable residential accommodation, and it provides for garden and amenity space.
- 8.5. The District does not have a 5 year supply of deliverable housing land. In such cases housing applications are expected by paragraph 11 of the NPPF to be considered in the context of the presumption in favour of sustainable development unless the harms would outweigh the benefits or a more restrictive approach to development is in force, as is the case in the AONB; the protection of which is afforded great weight.
- 8.6. As the Council are unable to demonstrate a five-year housing supply, the balance should tilt in favour of the policies within the NPPF. In this respect paragraph 11 d) is clear that

“where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting planning permission unless:

The application of policies in this Framework that protect areas of assets of particular importance provides a clear reason for refusing the development proposed; or

Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against policies in this Framework taken as a whole”.

- 8.7. Additionally Paragraph 213 states that *“existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)”.*

- 8.8. At the heart of the NPPF is a presumption in favour of sustainable development and for decision-taking this means approving development that accords with the development plan without delay. This proposal relates to the erection of dwellings within a designated area where there is the potential to accommodate some minor development and infilling.
- 8.9. The NPPF also supports the delivery of high quality homes in inclusive and mixed communities, and all housing applications should be considered in the context of the presumption in favour of sustainable homes. The location of the site means it is accessible to local amenities, public transport and services and is a sustainable location for new housing. Providing additional dwellings in a sustainable location within the village of Sedlescombe is supported.
- 8.10. The drive to focus new housing to sustainable locations resonates with Government policy expressed in the National Planning Policy Framework (the NPPF). The proposal would provide for a small scale residential development within an existing settlement where the principle is considered to be acceptable.

Neighbourhood Plan allocation

- 8.11. As indicated previously the site has been allocated within the Sedlescombe Neighbourhood Plan 2016 – 2028. The majority of new housing is to be directed in and around existing settlements.
- 8.12. Policy 2 – Land at Sunningdale is the relevant policy consideration for this site. The policy states the following –
- 8.13. The Neighbourhood Plan allocates land for approximately 9, and no fewer than 6, new dwellings on land off Gregory Walk. Development proposals will be supported, provided the scheme:
- 1. makes provision for the retention of the existing dwelling, if practicable, and for 1, 2 and/or 3 bedroom dwellings located entirely within the development boundary of Sedlescombe;*
 - 2. is accessed from Gregory Walk;*

3. comprises a layout and building orientation that does not harm the amenities of adjoining dwellings by way of overlooking;

4. avoids damaging the habitat of the River Brede and the adjoining river bank and protects the river's wildlife corridors;

5. retains the existing hedges on its boundaries; and

6. implements appropriate restoration to the adjoining River Brede, to the satisfaction of the Environment Agency.

8.14. To answer each criterion in turn.

8.15. The **retention of the existing dwelling** - The current indicative plans show how the site can accommodate up to 9 dwellings and still retain the existing bungalow. With regard to the **location of 1, 2 and/or 3 bedroom dwellings within the development boundary** the layout has attempted to provide a significant proportion of housing within the development boundary with the bulk of the affordable units positioned within it. It would not be possible to provide for a larger number of dwellings without sacrificing amenity space and impacting upon living conditions for future occupiers. The current layout enables the provision of the maximum density as a lower density of development at the site would be a lost opportunity for the provision of housing.

8.16. The site is **accessible from Gregory Walk**.

8.17. The chosen layout ensures that sufficient distance is provided between both the existing and proposed dwellings and ensures that the scheme **does not harm the amenities of adjoining dwellings by way of overlooking**. Whilst the final design is to be confirmed in a subsequent submission the layout as indicated shows one way in which sufficient amenity space and separation can be achieved without have a detrimental impact on neighbor amenity in terms of overlooking.

8.18. The scheme has also been designed to ensure that no built form encroaches on the **habitat of the River Brede and the adjoining river bank and wildlife corridors**. It is our intention to ensure that the biodiversity of this part of the site is protected and where possible enhanced.

- 8.19. In a similar vein we have ensured that all **the boundary hedging** which is worthy of retention **has been retained** where possible. Where there is an element of weak boundary hedging and planting then a detailed landscaping scheme would form the basis of the subsequent reserved matters submission.
- 8.20. Finally, the applicants would welcome the opportunity to work with The Environment Agency to enable the implementation of appropriate restoration to the adjoining River Brede. This again would form part of a subsequent detailed submission and we welcome any comments by the Environment Agency.
- 8.21. In view of the above points we consider that the current submission meets the requirements of Policy 2 of the Sedlescombe Neighbourhood Plan.
- 8.22. Additionally, it is worth noting that the 2014 Sites Assessment Report considered that the site was suitable for residential development confirming that *'The eastern part of the site is within the Development Boundary where there is no objection in principle to the provision of additional housing. Historically, the whole site was within an area where policy indicated that development would be appropriate. In any event the land forms part of the residential curtilage of Sunningdale, and there is existing residential development to the north, south and east. The proposal only involves a modest extension to the Development Boundary.'*
- 8.23. The assessment originally proposed 10 dwellings but this was later amended in the final adopted Neighbourhood Plan to 9 dwellings and preference for the retention of the bungalow. We have followed this requirement as outlined within the Plan.
- 8.24. With the retention of the existing bungalow and the erection of 9 units the site would continue to follow the recommendations outlined within the initial site assessment. This gives a density of development of 22.2 dwellings/hectare and this would *'compares very favourably with the adjoining development at Gregory Walk which extends to 0.5 hectares and contains 12 dwellings giving a density of 24 dwellings/hectare'*. This confirms that the density proposed in the current submission is comparable with its surroundings.
- 8.25. Overall, in both national and local policy considerations the proposal will provide for development that adheres to the requirements set out and the principle of development is acceptable.

Housing Mix

- 8.26. The application is made in outline and hence the housing mix will be fixed through the Reserved Matters stage. However, the objective is to create a balanced and mixed addition to the community and to ensure adequate ranges of types and tenures.
- 8.27. In order to provide surety that a development of this quantum can be delivered and an appropriate mix can be achieved the indicative housing mix is highlighted below.

No of bedrooms	No of units
1 (60 sqm)	1
2 (80 sqm)	3
3 (100 sqm)	4
4 (130 sqm)	1

Figure 9 – Proposed housing mix

- 8.28. Core Strategy Policy LHN1 seek a mix of 30% 1 and 2-bed dwellings (units) on such residential schemes. This proposal, is providing one single bedroom and three 2-bed dwellings, and significantly exceeds this policy requirement by providing a scheme which has over 40% small units, including bungalows. In line with Policy LHN2 provision would also be made for up to 4 no affordable homes which would also meet the relevant affordable criteria. Overall, the development will provide a substantial level of much needed affordable homes to meet highly specific local needs.
- 8.29. Additionally all dwellings will comply with the minimum national space standards and will have the required amount of amenity space.
- 8.30. In these terms, the proposal is acceptable in terms of housing mix, size and affordable provision as required by paragraph 61 of the NPPF and overall supports the social objective of achieving sustainable development.

The design and appearance of the scheme and the impact of these alterations on the character and appearance of the area and locality

- 8.31. Section 12 of the NPPF identifies that the Government attaches great importance to the design of the built environment and that new development should contribute positively to making places better for people.
- 8.32. When considering proposals in the AONB, the provisions of paragraph 172 of the Framework apply. Paragraph 172 of the NPPF places great importance on conserving landscape and scenic beauty in certain areas; including AONB's. It advises that planning permission should be refused for major developments in these designated areas except in exceptional circumstances. As the development is for the erection of 9 no dwelling houses it does not constitute 'major' development and does not conflict with national policy requirements in this regard.
- 8.33. At a local level policy EN1 is concerned with protecting the landscape characteristics.
- 8.34. The layout and density of the development will be approved during the Reserved Matters process. However, the illustrative layout plan has been very carefully coordinated and informed by the supporting technical documents, taking full account of the strengths and constraints of the Site.
- 8.35. The site occupies an indent in the built up area which is defined on three sides by built development, with its fourth side (the western boundary) defined by a robust and recognizable landscape feature and the hedgerows along the boundary of the site. These features effectively "tie" the site to the built up area and "divorce" it from the landscape to the west.
- 8.36. The landscaping forms a fundamental element of the layout with the mix of formal and informal spaces that serve as amenity space, wildlife habitat and corridors, and green buffers around the development plots and wider site. Additionally, the landscape surrounding the application site contains a number of field boundaries and copses, tree belts and hedgerows - the high incidence of vegetation features within this landscape creates enclosure and restricts views across the landscape towards the site.

- 8.37. Policy EN1 of the Core Strategy 2014 requires all new development to be of a high standard of design and layout. It should therefore complement the scale and form of adjacent buildings and areas and should not detract from the existing street scene and/or landscape and should respect important views, skylines or landscape features.
- 8.38. Whilst design is a reserved matter the proposal indicated would therefore result in a layout of development which would replicate the existing spatial qualities and character and appearance of the nearby streetscene and the wider landscape setting.
- 8.39. In accordance with Paragraph 127 of the NPPF and Local Policy EN1 of the Core Strategy 2014 the proposal functions very well, provides opportunities for good architecture, layout and appropriate landscaping and creates a place that is inclusive and accessible and which promotes health and wellbeing.
- 8.40. As a result, it is concluded that there are no landscape or visual reasons why the proposed development which is the subject of this planning application should be refused on landscape and visual grounds.

Impact on the amenity of neighbouring properties

- 8.41. This application deals with the principle of development on the site with design and appearance reserved. Nonetheless, it is inevitable that with any form of development on this site that there will be a change in perception and character. The layout has been carefully designed to ensure that buildings are located and orientated to avoid direct overlooking and achieve good levels of privacy between dwellings and adjoining neighbours.
- 8.42. The previous 2014 Site assessment considered the following *'It will be possible to carry out the development without causing unreasonable harm to the residential amenities of the existing properties in Gregory Walk. The site is sufficiently spacious to ensure that the creation of nine additional dwellings would result in sufficient distance between the proposed housing and the existing. The existing belt of trees around the site can be retained, and strengthened where necessary. This will further reduce the impact on both residential amenity and the character of the area.'*

- 8.43. The scheme has ensured that the position of the units provides sufficient separation distance and this can be seen by the retention of a minimum 21 metre gap from the rear elevation of the potential two storey properties that would back on to the existing dwellings along Gregory Walk.
- 8.44. The proposed access would pass away from neighbouring boundaries, remaining within the site providing a relationship which is not uncommon in residential settings. It is considered that the proposed 9 dwellings could achieve sufficient separation distance within the site without having an adverse impact upon the amenity of neighbouring properties in terms of overlooking and loss of privacy.
- 8.45. Whilst this change to amenity is acknowledged it is not considered that the likely effects of this modest scale of residential development upon neighbouring properties are sufficient to warrant the refusal of planning permission on these grounds. The proposed buildings will be well screened in most directions, either by existing trees or hedgerows or the provision of further planting as part of a landscaping enhancement.

The quality of living for future occupiers

- 8.46. The National Planning Policy Guidance states that *'good design should enhance the quality of buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well-being'*. Further to this the core principles of the NPPF as set out within paragraph 127 requires the planning system to always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. In terms of future occupants, the proposed dwellings would incorporate the provision of spacious living areas with sufficient external amenity spaces. There is ample available space to fulfil the amenity requirements of a mix of housing needs into the future.
- 8.47. In light of the above, it is considered that there are not any residential amenity matters that would constitute an adverse impact that would significantly and demonstrably outweigh the benefits of this proposal. The development would ensure a good level of amenity for future residents and provide a high-quality living environment. The site is well screened and would safeguard the amenities of those resident near to the site.

Transport and Highways

- 8.48. Paragraph 108 of the National Planning Policy Framework says decisions should take account of whether safe and suitable access to the site can be achieved for all people.
- 8.49. The previous 2014 site assessment confirmed that *'The highway authority have indicated that the access width and visibility splays from Gregory Walk onto the B2244 are acceptable. It is understood that the width of the existing road is also acceptable as the absolute minimum width of the road would be 4.1m and the majority of Gregory Walk is over 4.5m. A footway can be introduced into the site if required.'* The plans submitted with the application confirm that this arrangement is possible.
- 8.50. The proposed development would not amount to a significant material increase in traffic numbers, nor to any severe residual cumulative impacts. As such, there would be no requirement for this application to be accompanied by a Transport Statement or Transport Assessment, in accordance with Paragraph 109 of the NPPF.
- 8.51. The Site is very well located for a range of sustainable transport modes where future residents would also have the benefit of using existing public transport in the form of bus routes within the village.

Parking and turning and cycling provision

- 8.52. Whilst layout remains a reserved matter the illustrative plan demonstrates that a total of 20 off road parking spaces could be achieved with a further 2 road spaces for visitors to be provided. It is understood that this would meet parking requirements.
- 8.53. There is sufficient outdoor space to ensure cycling provision could also be adequately provided within the site.
- 8.54. In light of the above, it is clear that there is not any parking or highways matter that would constitute an adverse impact that would significantly and demonstrably outweigh the benefits of this proposal. The proposal would not give rise to any adverse transport impacts or the safety and convenience of the nearby highway, which is in accordance with Section 9 of the National Planning Policy Framework; Promoting Sustainable Transport.

Heritage Impacts from the proposal

- 8.55. There are no heritage assets within the site but the site is adjacent to the Sedlescombe Conservation Area to the east although it is not located within it. The proposed retention of existing boundary and other landscaping features such as additional hedgerows and planting ensure that the proposals do not result in significant changes to the setting of the Conservation Area.

Flood risk and Drainage

- 8.56. Paragraph 155 of the NPPF advises that inappropriate development in areas at risk from flooding should be avoided by directing development away from areas at high risk. The site had previously been considered to be within an area of flood risk. However, following re-assessment by the Environment Agency the site has been confirmed as within Flood zone 1 and not an area at high risk of potential flooding despite its proximity to the river Brede. At Appendix 3 we include the confirmation letter and the amended flood maps from the Environment Agency.



Figure 4 – EA Flood Map of the application site

- 8.57. As the site is a residential development its use is defined as 'more vulnerable' and as it lies within Flood Zone 1, this is identified as being compatible development therefore; there is no need for a Sequential Test, or an Exception Test.
- 8.58. As the site is in Flood Zone 1 there is no need for any fluvial/tidal based flood mitigation measures. Ground water, sewer and infrastructure courses of flooding are also considered to be low risk.
- 8.59. A drainage strategy has been commissioned (See **Appendix 5**) and confirms a number of measures to be put in place to retain water on site, including at all properties and an attenuation pond at the southern portion of the site below the access roadway and parking areas. The parking areas would be surfaced with permeable materials and there are extensive areas of unsurfaced green spaces within the site. The SUDS approach of permeable materials and attenuation tank has been considered as part of the indicative layout.
- 8.60. The proposals make provision for sustainable drainage in the form of surface water run-off into planting areas and the attenuation pond. The development would be fully compliant with Policy SRM2.

Ecology and Biodiversity

- 8.61. The NPPF at paragraph 170 seeks the enhancement of biodiversity through the planning system by recognising the wider benefits of ecosystem services and minimising impacts on biodiversity and providing net gains in biodiversity where possible. The NPPF at paragraph 174 does state that in the determination of planning applications local planning authorities should aim to conserve and enhance biodiversity.
- 8.62. A Preliminary Ecology Appraisal was undertaken by KB Ecology (See **Appendix 6**) to assess the potential for impacts on the habitats of protected species. The report concluded that other than a requirement for a survey for potential impacts on reptiles no additional survey was required.

- 8.63. The subsequent Reptile Survey and Mitigation Strategy (see **Appendix 7**) confirmed that whilst there would be the loss of a small amount of habitat *'it is expected that the development will not cover the whole land and that it should be possible to retain the population on site, by enhancing the areas of land outside the works footprint.'* We can confirm that any subsequent submission would address this requirement through the provision of suitable areas of hedgerow and planting which are to be retained and improved and together with the back gardens of residential plots which will provide ideal habitat.
- 8.64. The ecological reports also recognised the opportunity to include some ecological enhancements within the proposed development. These include the siting of ready-made bird boxes; planting of climbing plants on walls and vertical structures; and planting of wildflower plug/bulb planting within amenity grassland and private gardens. The report also identifies the integration of SUDS which have been adhered to within the Drainage Strategy.
- 8.65. The proposals do not result in the loss of important habitat but rather improve the existing situation. Thus the measures put in place make a significant contribution to protecting and enhancing the natural environment. It is considered that the potential additions will contribute to this rural area, whilst also providing improved habitats for wildlife, in accordance within the requirements of the NPPF. The proposal would be in line with paragraph 170 of the NPPF and Policy EN5, which seek to protect, manage and enhance local ecology.

Impact on Trees

- 8.66. There are currently no protected trees on the site and aside from a large Beech in the north western corner of the only trees in situ are located around the boundaries of the site. Nonetheless, the building operations associated with this proposal would have the potential to be reasonably substantial.
- 8.67. Therefore, an Arboricultural Impact Appraisal in accordance with BS5837:2012 and a Tree Survey has been carried out at the site and is included with this submission (See **Appendix 8**).

- 8.68. The survey confirmed that it will be important to ensure that the Beech tree and features on the boundary of the site which will remain will be protected from the development as it continues and therefore, any tree work should be carried out by a competent tree surgeon to comply with BS3998:2010 “Tree Work - Recommendations”.
- 8.69. The areas to be protected by fencing or ground protection shall be referred to as the construction exclusion zones. The following actions shall be prohibited within the construction exclusion zones:
- Vehicular access.
 - Regular pedestrian access unless on suitable ground protection.
 - Storage of construction materials.
 - Storage or handling of harmful chemicals.
 - Any change in ground level unless otherwise stated in this report or under supervision of an arboriculturalist.
 - Construction activities including hard surfacing.
- 8.70. The impact assessment of impact of the proposed development reveals that trees and the large Beech Tree can be retained and protected as part of the current proposal pending clarification with regards to the suitability of existing foundations.
- 8.71. Overall, the assessment concludes that, subject to appropriate conditions, development can be implemented without undue impact on trees and hedgerows.

Refuse and bin Storage

- 8.72. Although details for refuse can be conditioned it can be established from the indicative site plan that space can adequately be provided within this scheme to offer suitable provision for the storage of rubbish and recycling.
- 8.73. The access can provide for the Council’s large refuse / recycling vehicles as it has been tracked accordingly. House designs include storage for waste to be recycled.

Contamination

- 8.74. The Government's website clarifies that 'contaminated land' is used in general terms to describe land polluted by heavy metals, oils and tars, chemical substances, gases, asbestos or radioactive substances. It also clarifies that the legal definition of contaminated land includes substances that could cause significant harm to people or protected species, and/or significant pollution of surface waters or groundwater. Paragraph 003 of the 'land affected by contamination' section of the National Planning Policy Guidance identifies that Part 2A of the Environmental Protection Act 1990 provides a risk based approach to the identification and remediation of land where contamination poses an unacceptable risk to human health or the environment.
- 8.75. The site is garden land and contamination is unlikely to be an issue. It is submitted that there would not be any unacceptable risks from pollution and the development would be appropriate to its location, in accordance with Paragraph 180 of the National Planning Policy Framework. This issue should not therefore constitute a valid reason for refusal.
- 8.76. In the event that the Council considered that there was likely to be land contamination issues, then conditions could be imposed to ensure that adequate soil tests were carried out prior to the first use of the site for residential purposes (not prior to the commencement of the development).

9. Conclusion

- 9.1. The development will deliver a wide range of important planning benefits relative to the three (economic, social and environmental) objectives of sustainable development, as set out in paragraph 8 of the NPPF (2019).

Economic Benefits

- 9.2. The proposed development would provide economic benefits by supporting local businesses in terms of the needs of the occupiers. There would be an investment in local trades and suppliers. The 'Plan for Growth' published by HM Treasury in March 2011 confirms that a successful construction industry is vital for sustainable growth in the UK and sets out that this includes the construction and maintenance of homes. It notes that providing new homes in the right places is vital for economic competitiveness.
- 9.3. Even a purely residential, small-scale project is able to make a contribution to the economic aspect of sustainability. The project would provide employment opportunities for trades-people and a need for building materials, with a number of economic benefits from the construction process likely to be felt at the local level. The increased population will help ensure that the future viability of community facilities, post office and schools, is supported in the long term.
- 9.4. Therefore, with regards to the economic dimension of the sustainability agenda, the proposal would provide benefits by supporting local businesses in the short term, and would act to enhance the economic vitality and viability of the area in the mid to long terms. As such there are no known economic disadvantages which would be comparable to the positive impacts of the proposed development.

Social benefits

- 9.5. With regard to the social dimension, the proposal would provide benefits in the form of 9 new dwellings, which would make a valuable contribution to local housing supply, without detriment to neighbouring residential amenities.

- 9.6. As to whether the site represents a sustainable location for housing, paragraph 78 of the National Planning Policy Framework says, *“to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities”*.
- 9.7. The site is located within the village of Sedlescombe and abuts residential development on the north, east and south. Due to its location amongst existing built development, the site benefits from local bus routes and a local shop. There is also a public house, village hall and Church within the village. There is a primary school with larger secondary schools within neighbouring villages of Robertsbridge and also Hastings.
- 9.8. The site cannot be considered to be ‘isolated’ given the fact that it is surrounded by residential properties to the north, east, south and west. To the contrary, the site’s position adjacent to the existing residential area makes it a legitimate and logical infill plot, which could readily accommodate two new dwellings without compromising the quality or character of the area.

Environmental benefits

- 9.9. This proposal is for the redevelopment of an existing residential site, which adjoins existing residential dwellings to the north, east and south.
- 9.10. The indicative layout of the site and the dwellings have been carefully considered. The submitted drawings illustrate how this residential redevelopment could provide a layout and design consistent with the character of the surrounding area which contains a mix of house types and styles. It is therefore submitted that the proposed development could be carried out in a manner which integrates successfully into this location, retaining the character of the area.
- 9.11. Enhancements to the site will also be carried out through landscaping improvements, including the retention of existing trees and the planting of new shrubs and hedging. The proposals do not result in the loss of important habitat but rather offer an opportunity to improve the existing situation. Thus the measures put in place make a significant contribution to protecting and enhancing the natural environment.

- 9.12. Given the sustainability of the location and as the proposal can be designed in a way which ensures there would not be any significant visual impact, there is not known to be any environmental disadvantages which would significantly and demonstrably outweigh the overall benefits.
- 9.13. It is submitted that this proposal would constitute a sustainable form of development when compared against the three dimensions to be considered in accordance with Paragraph 8 of the NPPF, namely the economic benefits, the social benefit, including the sustainability of the location, and the environmental benefits, including landscape and visual impacts.
- 9.14. Additionally, there are no material considerations which indicate that this application should be restricted.
- 9.15. The development is therefore considered to be in accordance with local and national planning policies and requirements, particularly in regard to paragraph 38 of the NPPF, which states that local planning authorities should approach decision-making in a positive and creative way and advises that they should use the full range of planning tools available, seeking to approve applications to sustainable development where possible.
- 9.16. As such, we trust that this outline application for the creation of 9 additional dwellings can be considered favourably.

10. Appendices

Appendix 1 – SNP April 2018 (selected pages)

Appendix 2 – SNP Final Assessment (selected pages)

Appendix 3 – EA Flood Map Challenge details

Appendix 4 – ESCC Highways Comments 2016

Appendix 5 – RSPD Drainage and SUDS Strategy

Appendix 6 – KB Ecology – Preliminary Ecological Appraisal

Appendix 7 – KB Ecology – Reptile Survey and Mitigation Strategy

Appendix 8 – Arboricultural Mitigation Strategy – Owen Allpress