

Planning and Affordable Housing Statement

Land at Ashplats House, East Grinstead
On behalf of Mr and Mrs Bos

Demolition of Ashplats House and erection of 30 residential dwellings (All matters reserved except for access).

at

Ashplats House, Holtye Road, East Grinstead

Planning Supporting Statement

on Behalf of

Bos & Mrs A Bos

April 2019

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1. Introduction

- 1.1 This statement has been prepared on behalf of Mr and Mrs Bos, in support of an outline planning application for the demolition of Ashplats House, Holtye Road, East Grinstead and the erection of 30 residential dwellings (all matters reserved except for access). The application is made in accordance with policy EG6a of the East Grinstead Neighbourhood Plan (EGNP) which allocates the site for residential development.
- 1.2 The statement considers the site and surrounding area, planning history, the scheme itself, relevant planning policy and an appraisal of the scheme in light of these considerations. It concludes that the proposal is a carefully considered scheme, responding well to the context of the site and meets guidance contained in the Development Plan and the National Planning Policy Framework.
- 1.3 The planning application is the result of the significant site assessment. In addition to the application drawings it is supported by the following documentation:

Document	Author
Design and Access Statement	Fluid Architects
Planning and Affordable Housing	DMH Stallard
Sustainability Statement	DMH Stallard
Statement of Community Involvement	DMH Stallard
Arboricultural Impact Assessment	Canopy Consultancy
Preliminary Ecological Assessment	The Ecology Partnership
Transport Statement and Road Safety Audit	DHA Transport
Archaeological Desk Based Assessment	Orion Heritage
Flood Risk and Drainage Assessment	HSP Consulting
Land Contamination Report – Stage 1	Lustre Consulting

2. The Site and Surroundings

- 2.1 The site comprises land at Ashplats House, Holtye Road, East Grinstead. It is currently accessed via a small private (unnamed) lane to the east of the site, which connects to Holtye Road (the A264) which is the main east-west link road to Crawley, Horsham and Tunbridge Wells. It is located on the eastern boundary of East Grinstead, a Category 1 settlement; it is within Mid Sussex District.
- 2.2 The site is located adjacent to, but not within, the development boundary. However, the EGNP and the Mid Sussex District Plan (MSDP) Proposals Map, identify the site (including Ashplats Lodge) as a housing allocation.
- 2.3 Ashplats House is a large 2.5 storey detached dwelling and associated outbuildings, situated within a large rectangular plot which is laid to private garden. It extends to approximately 1.1 hectares (ha). The site is well screened by significant boundary trees, hedgerows and ornamental bushes. Some of the boundary trees are subject of a TPO (the TPO is set out in the accompanying Arboricultural Implications Assessment (AIA)).
- 2.4 The site is a parcel of land bound on all sides by existing residential development. Ashplats Lodge is to the east of the site, and the recent residential development known as 'Bluebell Gate' envelopes the site to the west and south. Beacon Rise, another new development, is located to the north.
- 2.5 The site is not within any protected landscapes and is within Flood Zone 1 and therefore has the lowest probability of Flooding. It is within the 7km zone of influence of the Ashdown Forest SPA.
- 2.6 By road, the site is within 2.6km of the Town Centre, however, existing and well maintained public rights of way exist through Ashplats Wood to the south of the site and through East Court, which provide a more direct route for pedestrians. It is within 2km of the nearest primary school (Blackwell Primary School) and only 3km of Sackville Secondary School. There is a range of local employment opportunities within the Town, including the Queen Victoria Hospital approximately 1.5km from the site. A local parade of shops is approximately 1km from the site on Holtye Avenue.

3. Planning History

3.1 There is extensive planning history relating to the site, largely in relation to the development of land now known as 'Bluebell Gate', previously associated with Ashplats House. The planning history of the site is set out below:

- GR/249/90 – Outline application for erection of residential dwellings, roads, sewers and ancillary works – *Refused (Appeal made – withdrawn)*
- GR/242/94 – Enlargement of existing two bedroomed chalet bungalow – *Permission.*
- GR/205/95 – Enlargement of existing two bedroomed chalet bungalow – *Permission*
- GR/205/95/AP1 – Amended plans application: enlargement of existing two bedroomed bungalow. – *Permission*
- 10/01317/OUT – Residential development on land adjacent to Ashplats House, and access from Holtye Road comprising 117 units as a mix of 117 dwelling houses and flats. – *Permission*
- 12/00657/TREE – Blue Cedar (T1) – Remove snow damaged branches. Larch – fell. 2 larch – reduce by 7m. – *Permission*
- 12/00716/REM – Reserved Matters application seeking approval of appearance, landscaping, layout and scale for residential development comprising 117 units as a mix of dwelling houses and flats. – *Approval (RM)*
- 13/0487/REM – Application for approval of reserved matter of landscaping from application 10/01317/OUT for the residential development on land adjacent to Ashplats House, and access from Holtye Road; comprising of 117 units as a mix of dwelling houses and flats. – *Approval (RM)*
- DM/15/4053 – Beech (T5) – reduce two lowest branches back to main trunk. Oaks x 2 (A1) – Reduce branches overhanging fence and new buildings by 2-3m. – *Permission*
- DM/16/2169 – Retrospective permission to retain existing marketing suite to be suitably adapted to provide covered car barn adjacent to originally approved triple garage serving plots 112 and 11. – *Permission*

4. The Scheme

- 4.1 The proposal consists of the demolition of Ashplats House and associated buildings, and the erection of 30 dwellings, in accordance with its allocation within the EGNP. The density of development is 27dph.
- 4.2 The application is made in outline, with all matters reserved except access, which is a detailed matter. Access will be via Greenhurst Drive and Holtye Road.
- 4.3 An indicative layout is submitted pursuant to the outline application. Whilst it is indicative only, it reflects significant site assessment and represents what can be achieved on the site. The mix associated with this layout is as follows:

	1 bed (flat)	2 bed (flat)	2 bed (house)	3 bed (house)	4 bed (house)	Total
Market	2	0	6	7	6	19
Affordable	3	2	3	1	0	9

- 4.4 In accordance with planning policy, 30% (9 units) of the development will comprise affordable housing.
- 4.5 The development provides for 71 parking spaces, including garages. Cycle parking can be accommodated within the garages or within sheds.

5. Planning Policy Context

5.1 The development plan for the purposes of determining this application consists of the following:

- National Planning Policy Framework 2019 (the “NPPF”)
- Mid Sussex District Plan 2018 (the “MSDP”)
- East Grinstead Neighbourhood Plan 2016 (the “EGNP”)

The National Planning Policy Framework 2019

5.2 The NPPF sets out the Government’s policies for England and how they should be applied. It requires that planning applications are determined in accordance with the presumption in favour of sustainable development. Sustainable development is considered to have three overarching objectives:

- a) An economic objective – to help build a strong, responsible and competitive economy;
- b) A social objective – to support 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;
- c) An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment, including making effective use of land.

5.3 The presumption in favour of sustainable development, set out at paragraph 11 of the NPPF requires that for decision taking, development proposals that accord with an up-to-date development plan should be approved without delay.

5.4 Section 4 of the NPPF refers to decision-making. It requires that local planning authorities approach decisions on proposed development in a positive and creative way. It requires that decision-makers seek to approve applications for sustainable development where possible.

5.5 Section 4 also acknowledges the importance of early engagement, which has significant potential to improve the efficiency and effectiveness of the planning application system, noting that good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.

- 5.6 Section 5 of the NPPF sets out the Governments policies for significantly boosting the supply of new homes.
- 5.7 Section 8 promotes policies and decisions that aim to achieve healthy, inclusive and safe places, as well as providing for social, recreational and cultural facilities.
- 5.8 Section 9 promotes sustainable transport. It requires that the potential impacts of development, on transport networks, are addressed and that there are opportunities to promote walking, cycling and public transport. Paragraph 109 states that development should only be prevented or refused on highways grounds, where there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 5.9 Section 11 of the NPPF requires that policies and decisions promote an effective use of land in meeting the need for homes, whilst safeguarding and improving the environment.
- 5.10 Paragraph 122 of the NPPF promotes the efficient use of land, taking into account:
- a) The identified need for different types of housing, and the availability of land suitable for accommodating it;
 - b) Local market conditions and viability;
 - c) The availability and capacity of infrastructure and services;
 - d) The desirability of maintaining an area's prevailing character and setting; and
 - e) The importance of securing well-designed, attractive and healthy places.
- 5.11 Section 12 of the NPPF sets out the need to achieve well-designed places. It acknowledges that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. It states that good design is a key aspect of sustainable development, and creates better places in which to live and work.
- 5.12 Paragraph 127 requires that planning decisions ensure development:
- 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 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 user.

5.13 Paragraph 128 requires that design quality is considered throughout the evolution and assessment of proposals, including early discussion between applicants, the local planning authority and local community.

5.14 Section 14 responds to the needs to meet the challenge of climate change, flooding and coastal change. It requires that proposals take account of the long-term implications for flood risk, water supply, biodiversity and landscapes. Paragraph 163 suggests that where appropriate, applications should be supported by a site-specific flood-risk assessment, it also requires that major developments should be incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.

5.15 Section 15 of the NPPF requires the conservation and enhancements of the natural environment, by:

- a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value;
- b) Recognising the intrinsic character and beauty of the countryside;
- c) Maintaining the character of the undeveloped coast, whilst improving public access to it where appropriate;
- d) Minimising impacts on providing net gains for biodiversity;
- e) Preventing new and existing development from contributing to soil, air, water or noise pollution or land instability.
- f) Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

5.16 Section 16 of the NPPF refers to the conservation and enhancement of the historic environment. Paragraph 187 refers to the need for local authorities to hold up-to-date historic environment records, to be used in assessing the significance of heritage assets and predicting the likelihood that unidentified heritage assets, including those of archaeological interest, will be discovered.

- 5.17 Paragraph 189 requires that where development has the potential to include heritage assets of archaeological interest, developers will be required to submit an appropriate desk-based assessment.
- 5.18 Paragraph 197 notes that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Mid Sussex District Plan 2018

- 5.19 The MSDP was adopted in 2018 and sets out the vision and a strategy for how that will be achieved.
- 5.20 Policy DP4 of the MSDP sets out the strategy for delivering housing need across the plan period. It identifies an objectively assessed (housing) need (OAN) of 14,892 and provision towards unmet housing needs of 1,498, resulting in a housing requirement of 16,390 dwellings between 2014-2031. The housing requirement will be met through a stepped trajectory of 879 dwellings per annum (dpa) until 2023/24 and 1,090 thereafter.
- 5.21 Policy DP4 sets out the District Plan minimum requirements and notes that 7,091 dwellings are met through existing commitments, including allocations in made Neighbourhood Plans.
- 5.22 Policy DP6 sets out the settlement hierarchy, noting that East Grinstead is a Category 1 Settlement (along with Burgess Hill and Haywards Heath), which is a *“Settlement with a comprehensive range of employment, retail, health, education, leisure services and facilities. These settlements will also benefit from good public transport provision and will act as a main service centre for the small settlements.”*
- 5.23 Policy DP6 also states that the growth of settlements will be supported where this meets identified local housing needs. Outside development boundaries, the expansion of settlements will only be supported where:
1. The site is allocated in the District Plan, a Neighbourhood Plan, or subsequent Development Plan Document or where the proposed development is for fewer than 10 dwellings; and
 2. The site is contiguous with an existing built up area of the settlement; and
 3. The development is demonstrated to be sustainable, including by reference to the settlement hierarchy.

- 5.24 Policy DP12 refers to the protection and enhancement of the countryside. It notes that the countryside will be protected in recognition of its intrinsic character and beauty. Development will be permitted in the countryside, provided that it is supported by a specific policy elsewhere in the plan or relevant Neighbourhood Plan.
- 5.25 Policy DP13 refers to the prevention of coalescence and ensuring that towns and villages retain their own unique characteristics.
- 5.26 Policy DP15 refers to new homes in the countryside, requiring that the proposed development meets the requirements of Policy DP6: Settlement Hierarchy.
- 5.27 Policy DP17 seeks the protection of the Ashdown Forest SPA and SAC. Within a 7km zone of influence of the Ashdown Forest SPA, residential development must contribute towards the provision of Suitable Alternative Natural Greenspace (SANG), and a financial contribution towards Ashdown Forest Strategic Access Management and Monitoring (SAMM) strategy.
- 5.28 Policy DP20 seeks contributions towards infrastructure mitigation, where necessary.
- 5.29 Policy DP21 refers to transport. It requires that decisions on development proposals take account of whether:
- The scheme is sustainably located to minimise the need for travel;
 - Appropriate opportunities to facilitate and promote the increased use of alternative means of transport to the private car;
 - The scheme is designed to adoptable standards, or other standards as agreed;
 - The scheme provides adequate car parking for the proposed development;
 - Development which generates significant amounts of movement is supported by a Transport Assessment/Statement and a Travel Plan;
 - The scheme provides appropriate mitigation to support new development on the local and strategic road network;
 - The scheme avoids severe additional traffic congestion, individually or cumulatively, taking account of proposed mitigation;
 - The scheme does not harm the special qualities of the South Downs National Park or High Weald Area of Outstanding Natural Beauty through its transport impacts.

- 5.30 Policy DP22 seeks the protection and promotion of rights of way and recreational routes, ensuring that development provides safe and convenient links to such routes.
- 5.31 Policy DP26 refers to character and design, it requires a range of design criteria to be met, ensuring a high quality of design, landscaping and greenspace.
- 5.32 Policy DP27 requires that development meets nationally described space standards for internal floor space.
- 5.33 Policy DP28 requires that development meets and maintains high standards of accessibility. In addition, for developments of 5 or more, a provision of 20% of dwellings to meeting Category 2 – accessible and adaptable dwellings (Building Regulations – Approved Document M Requirement M4(2) will be required.
- 5.34 Policy DP30 requires a mix of dwelling types and sizes, to reflect current and future housing needs.
- 5.35 Policy DP31 requires that for developments of 11 dwellings or more, 30% on-site affordable housing should be provided.
- 5.36 Policy DP34 requires the protection of heritage assets, including buildings that are not listed, with a preference towards their retention where they are of architectural or historic merit. The Council will determine proposals affecting heritage assets in accordance with the NPPF and NPPG.
- 5.37 Policy DP37 seeks the protection and enhancement of trees, woodland and hedgerows, the loss of protected species will only be permitted if there is no alternative and replacement trees (1:1) are provided.
- 5.38 Policy DP38 requires the protection and enhancement of biodiversity. Ensuring that development contributes and takes opportunity to improve, enhance, manage and restore biodiversity and green infrastructure. Proposals should protect existing biodiversity, so that there is no net loss of biodiversity and minimise habitat and species fragmentation and maximises opportunities to enhance and restore ecological corridors to connect natural habitats.
- 5.39 Policy DP39 seeks to improve the sustainability of development through its design and construction.
- 5.40 Policy DP41 requires that developments follow a sequential risk-based approach to flood risk, including a reduction from existing run-off rates. Sustainable Drainage Systems (SuDS) should be implemented in all new developments of 10 dwellings or more. SuDS should be sensitively designed

and located to promote improved biodiversity, an enhanced landscape and good quality spaces.

- 5.41 The associated East Grinstead Proposal Map, shows the land at Ashplats House as an identified housing allocation.

East Grinstead Neighbourhood Plan 2016

- 5.42 The EGNP was made in 2016, it predates the MSDP 2018, but remains part of the development plan insofar as it accords with the MSDP.

- 5.43 Policy EG3 seeks the promotion of good design, requiring that it is:

- a) The form of the proposed development is proportionate and in keeping with the scale, height, materials and site coverage of the surrounding area;
- b) The layout of the proposed development respects the topography and character of the site, protects important landscape features and does not harm adjoining amenity;
- c) The proposal does not result in the loss of buildings or spaces that would have an unacceptable impact on the character of the area;
- d) The proposal ensures satisfactory means of access for vehicles and pedestrians and provides adequate parking, cycle storage and refuse facilities on site;
- e) The design of new buildings and the layout of spaces, including footways, car and cycle parking areas, should be permeable and provide connectivity with neighbouring areas;
- f) New development must be inclusive and where appropriate make satisfactory provision for the safe and easy access for those with mobility impairment; and
- g) The design of new developments must result in the creation of a safe and secure environment and incorporate adequate security measures and features to deter crime, fear of crime, disorder and anti-social behaviour; and
- h) Proposals make provision for green infrastructure and biodiversity enhancement.

- 5.44 Policy EG5 sets out how housing will be delivered within the EGNP area, including site allocations with are set out at policy EG6a and EG6b. Ashplats House is identified as 'Site 11' of policy EG6b, noting that it would be suitable for between 35 – 45 dwellings, being surrounded on 3 sides by existing development. It refers to access being provided via Greenhurst

Drive. It is shown in the summary table as accommodating 45 dwellings. (It should be noted that the site shown on the site allocations plan, includes land at Ashplats Lodge.)

- 5.45 Policy EG7 requires a minimum density of 30 dpa, unless local character indicates otherwise. It also requires that on sites of 5 or more dwellings, a minimum of 30% small family accommodated is provided in the form of 2 and 3 bedroom properties.
- 5.46 Policy EG11 identifies highways constraints within the neighbourhood plan area. As such, new proposals are expected to be supported by an appropriate assessment of the impacts on the highway network, and include access arrangements that are appropriately designed and include adequate visibility splays.
- 5.47 Policy EG12 requires that vehicle and cycle parking is provided in accordance with the West Sussex County Council adopted parking standards.
- 5.48 Policy EG16 requires the protection of the Ashdown Forest SAC and SPA through the contribution towards SANG and SAMM.

6. Scheme Appraisal

6.1 The scheme seeks outline planning permission for the erection of 30 no. dwellings (30% affordable) on land at Ashplats House, Holtye Road, East Grinstead. All matters are reserved, except for access.

6.2 The principal issues in relation to this application are:

- The principle of development
- Housing Mix and Affordable Housing
- Design and layout
- Highways and Access
- Trees and landscaping
- Archaeology
- Ecology
- Drainage
- Sustainability

Principle of development

6.3 Policy DP4 of the MSDP sets out the housing requirements of 16,390 dwellings over the plan period. It notes that 7,091 dwellings will be met through existing commitments, which includes neighbourhood plan allocations.

6.4 Furthermore, policies DP6 and DP12 note that development will be supported outside defined settlements boundaries (ie. within the 'countryside') where it is identified within a Neighbourhood Plan, it is contiguous with the built up area and is a sustainable location, including reference to the settlement hierarchy. The proposal therefore accords with policies DP6 and DP12.

6.5 The site is outside the defined settlement of East Grinstead, however, it adjoins the built up area boundary on 3 of its sides. The site is allocated within the EGNP at policy EG6b for 35-45 dwellings. (Whilst policy EG6b refers to land at Ashplats House, the plan clearly shows the site allocation to include land at Ashplats Lodge, under separate ownership.) This application is therefore being brought forwards in accordance with policy EG6b of the EGNP.

6.6 The site is also identified on the Mid Sussex Proposal Map as a site allocation and is included within the Mid Sussex 5 year housing land supply (HLS), as submitted to the MSDP Examination for 45 dwellings, the application therefore contributes towards the Council's housing commitments and 5yr HLS.

- 6.7 It should be noted, that whilst the site is outside a defined settlement boundary, other sites allocated within neighbourhood plans (made at the time of the adoption of the District Plan) have been included within the new settlement boundary, such examples include Haywards Heath and Turners Hill. The application should not be prejudiced by this inconsistency, it is an allocated site that accords with the development plan, and as such, should be considered positively in accordance with the presumption in favour of sustainable development.
- 6.8 Policy DP13 of the MSDP refers to the prevention of coalescence, the site is set back from the road and is not visible on entering or leaving East Grinstead via the Holtye Road. Furthermore, it will utilise the existing access from Greenhurst Drive onto Holtye Road. As such, the development of the site will not lead to actual or perceived coalescence.
- 6.9 The principle of housing development on land at Ashplats House is therefore clearly established through the EGNP and acknowledged on the Mid Sussex Proposal Map. It contributes towards the housing requirement, as set out in policy DP4 and the Council's 5 yr HLS.

Housing Mix and Affordable Housing

- 6.10 The proposal seeks outline planning permission for 30 no. residential dwellings. This is broadly compliant with the site allocation, which identifies the capacity of the site for 35-45 dwellings; it is important to note that the site, as allocated, also comprises land to the east of the application site, at Ashplats Lodge.
- 6.11 The site is approximately 1.1 ha of land, development of the site for 30 dwellings represents a density of 27dph, however, this does not account for undevelopable parts of the sites, such as the treed boundaries, and therefore the true density is higher. Policy EG7 of the EGNP, requires a minimum density of 30dph and the application accords with this policy, making best use of an identified housing site.

Housing Mix

- 6.12 The proposed housing mix is set out below. It provides for a good mix of dwellings types and sizes, in accordance with policy DP30 of the MSDP. In particular, it provides a good proportion of small dwellings, in accordance with policy EG7 of the EGNP which requires 20% 2 and 3 bed dwellings; the proposal delivers 80%.

	1 bed (flat)	2 bed (flat)	2 bed (house)	3 bed (house)	4 bed (house)	Total
Market	2	0	6	7	6	19
Affordable	3	2	3	1	0	9

- 6.13 East Grinstead Town Council (EGTC) in their pre-application response to MSDC noted that they would encourage the majority of the development to be small 2 and 3 bed properties, it is considered that the proposal meets and exceeds this expectation.

Affordable Housing

- 6.14 Policy DP31 of the MSDP requires that for developments of 11 or more (or more than 1,000sqm), 30% on-site affordable housing should be provided. The indicative layout provides for 9 affordable housing units, in accordance with policy DP31.
- 6.15 The indicative housing layout provides for 7 social rented units and 2 shared ownership units, broadly a 70%/30% split. However, the final details of the affordable housing will be secured through the S106 and reserved matters application.
- 6.16 The affordable housing is delivered in two areas of the site, ensuring social integration. The Council's Housing Officer in response to the pre-application request for advice noted that the *"illustrative layout shows the affordable homes located in two distinctly separate areas of the site which demonstrates consideration has been given to community cohesion within the development. The broad mix of private units will further contribute to social integration and the creation of a balanced community."*

Design and layout

- 6.17 The proposal is submitted as an outline planning application, with all matters reserved except for access. As such, matters of layout, scale, appearance and landscaping are reserved for later consideration.
- 6.18 The application is supported by significant site assessment, which has informed the indicative site layout. On grant, of planning permission, the site will be sold to a housebuilder, as such, the application is submitted to ensure sufficient flexibility in this process. However, the layout is submitted is considered to be a reflection of the constraints and opportunities of the site, whilst making efficient use of the site and it is the result of pre-application discussions with the Council's Urban Designer. As such, it is expected that the forthcoming reserved matters application will be broadly similar to the indicative layout submitted.
- 6.19 The site will be accessed via Greenhurst Drive, a recent development built by Barratt Homes. Greenhurst Drive connects to the Holtye Road. This application seeks to agree the details of access onto Greenhurst Drive and is set out in the scheme drawings and the accompanying Transport Statement and Road Safety Audit. The position of the access point has largely been determined by the pattern of development along Greenhurst Drive and the

protected boundary trees to ensure it meets technical standards and ensures the protection of existing residential amenity.

- 6.20 The application is supported by a Design and Access Statement (DAS), which details the scheme evolution, from original concept to the submitted indicative layout. It considers the pre-application comments received from the Council's Urban Designer on-site, and following the submission of a revised site layout.
- 6.21 The layout is a reflection of the constraints and opportunities of the site, namely the strong treed boundaries and TPO'd trees (including a group of protected trees along the northern boundary). However, as the site forms only part of the wider site allocation, it is necessary to provide a point of access to Ashplats Lodge, to ensure that development of the remaining site could be accommodated at a later date. It should be noted that at present, there is no indication that the additional parcel of land, in separate ownership, will come forwards.
- 6.22 The indicative layout is based on two storey dwellings, this is considered appropriate to deliver an appropriate mix of dwelling sizes whilst accommodating the associated parking requirements. However, it should be noted that there are a number of buildings on the boundaries of the site, within the developments surrounding the site, which are 2.5 and 3 storeys.
- 6.23 Policies DP27 and DP28 of the MSDP require that proposals meet national space standards and provide accessible dwellings. This can be achieved through the indicative layout, and confirmed through the submission of reserved matters.
- 6.24 The layout enables significant informal open space to be provided around the large protected cedar tree, but also along the boundary with Greenhurst Drive. Additionally, formal and informal footpaths are proposed to the north of the site, enabling residents of Bluebell Gate, as well as future residents, to utilise the existing public right of way to the east of the site, which connects into Ashplats Wood towards East Court, as such, the proposal contributes to the protection and promotion of recreational routes, in accordance with policy DP22 of the MSDP.
- 6.25 It is considered that the indicative layout is a well thought out, reflecting the constraints and opportunities of the site. It provides for a good housing mix, ensures the retention of protected trees and also enables future access to the remaining site allocation. The proposal accords with policy DP26 of the MSDP and EG3 of the EGNP.

Highways and access

- 6.26 The application is supported by a Transport Statement, Road Safety Audit and Designers Response. The application seeks permission for the access onto Greenhurst Drive and this is detailed within the Transport Statement.
- 6.27 Greenhurst Drive is a private road, included within the management company for the adjoining development. The applicants have a legal right, secured by Transfer and referenced within the Land Registry Deeds, to access Greenhurst Drive and to utilise it for onward access to Holtye Road. A contribution will need to be made by future occupiers towards the management of Greenhurst Drive through the respective management companies.
- 6.28 The access to the site will be achieved via a new priority junction on Greenhurst Drive. It will follow the standards set out in the DMRB TD 42/95. It will be a carriageway width of 4.8 with a kerb radii of 6.0m and 8.0m. It provides visibility splays of 2.4m by 43m, as required by the standards.
- 6.29 Access for pedestrians will be via the new access to Greenhurst Drive, with footways measuring 2m on both sides. Additionally, a public footpath lies to the east of the site and a connection will be retained via a footway through the site, also allowing access for existing residents.
- 6.30 Data from TRICS has been obtained to forecast the number of trips that could be associated with the development, which identified a total of 16 trips in the morning peak (arrivals and departures) and 15 trips in the afternoon peak. Additionally, a PICADY junction capacity assessment was carried out for the A264 Holtye Road / Greenhurst Drive junction, covering the peak weekday periods. The outcome indicated that the junction operates well within capacity during the 2024 assessment year plus development scenario, ensuring the suitability of this junction to accommodate the development proposals. The Transport Statement concludes that the proposals will not materially impact highway safety in this location or within the wider network and as such, the proposal is compliant with policies DP21 of the MSDC and EG11 of the EGNP.

Parking

- 6.31 A total of 71 parking spaces are provided within the proposals; 63 of which are allocated spaces and 8 for visitors. This accords with the Mid Sussex parking requirements, set out in the Development Infrastructure and Contributions DPD, which would require 61 spaces, and the West Sussex Parking Calculator, which requires 62 allocated parking spaces plus 9 unallocated (71 in total). The proposal therefore accords with DP 21 of the MSDC and policy EG12 of the EGNP.

- 6.32 Parking for bicycles will be provided within garages or garden buildings, to be secured through the detailed design proposals.

Refuse collection

- 6.33 The layout ensures that refuse can be collected from all plots within the required standards. Plots 19, 20 and 21 will also be served from Greenhurst Drive.

Trees and hedgerows

- 6.34 The application is supported by an Arboricultural Implications Assessment (AIA) and tree survey plan. The boundaries comprise mature trees and hedgerows. A number of trees within the site are protected by Tree Protection Order 7, 1990.

- 6.35 Generally the trees on site are of good quality and vary in terms of their contribution towards the amenity of the site and surrounding area. The AIA defines 3 character groups:

1. Large mature trees, on or adjacent to the site boundaries. These are generally of good quality and provide good amenity to the wider area.
2. Medium sized, middle-aged trees found across the site. Many of these are in good condition and provide some amenity. A number of trees in this group are non-native conifers, some of which are dead or dying.
3. Smaller scale, garden scale trees found across the site. These are generally in good condition but due to their size are of limited amenity value.

- 6.36 The AIA sets out those trees to be retained, and those to be removed to enable development of the site. In addition, a number of boundary non-native conifers will be removed from the boundaries, as agreed with the Council's Tree Officer, and replanted with native species more in keeping with the setting of the site.

- 6.37 The site is well contained by the boundary trees, which offer an attractive setting for the proposal as well as providing screening from existing residential properties. The retention and removal of trees is considered to strike an appropriate balance between protecting important trees whilst making best use of the site. It is therefore compliant with policy DP37 of the MSDP.

Ecology

- 6.38 The application is supported by a Preliminary Ecology Appraisal (PEA) and a Tree Survey. The PEA notes that the site comprises the main house,

bungalow and associated outbuildings, the majority of the gardens comprising well managed semi-improved grassland.

- 6.39 Presence of Great Crested Newts and reptiles was discounted on the basis that the site represented sub optimal habitat.
- 6.40 A European protected species licence was obtained for dormice, 150m south-west of the site, relating to the Bluebell Gate development, this now divides the site from the Ancient Woodland beyond. It is noted that the hedgerows surrounding the site consist largely of cypress trees and only a small number of species which are likely to support commuting and foraging dormice. Much of the site is dominated by grassland and amenity shrubs, not considered suitable habitat for dormice.
- 6.41 The PEA acknowledges that the buildings onsite have the potential to support bats. Ashplats House was surveyed externally and internally and the building showed some signs of features which could be used by roosting bats and some bat droppings were observed within the eastern roof void. The bungalow was in a similar condition, but no bat droppings were observed. In addition, the PEA identifies the potential for trees to accommodate roosting bats, and as such recommends a further assessment of any trees to be removed, this also supports the application, this concludes that the trees to be removed have no potential to support bats. In light of the identified bat droppings, it is proposed that sensitive lighting is proposed and bat boxes are placed throughout the development.
- 6.42 The site is not considered to be of ecological merit, although it is likely to have some presence of bats within the main buildings on the site, as such, mitigation is proposed. The development proposal is considered to ensure the protection of protected species and is therefore compliant with policies DP38 of the MSDP. The site is within 7km of the Ashdown Forest. Policies DP17 of the MSDP and EG16 of the EGNP require new developers to contribute towards SANG and SAMM, this can be achieved through the S106 Agreement and as such the development will accord with both policies. It should also be noted, that Ashplats Woods, a strategic SANG is only 200m from the site, connected by existing and proposed footpaths.

Archaeology and heritage

- 6.43 An archaeological desk based assessment (DBA) has been prepared, in accordance with the findings of the Historic Environment Record search, a Mid Sussex validation requirement and in accordance with the findings on the adjoining site.
- 6.44 The archaeological DBA identifies some moderate potential for truncated / fragmented sub-surface evidence of field systems (late prehistoric) within parts of the site not previously disturbed. However, based on the findings of the adjoining site, these are likely to only be of negligible importance to local

archaeological interest. Notwithstanding the level of importance, it is recommended that trial trenching be undertaken, but this can be secured through planning condition.

6.45 The archaeological DBA also identifies Ashplats House as a non-designated heritage asset of 'fairly limited local importance'. The Report notes that when assessing the building against the Historic England Local Heritage Listing, there is limited evidence that the building has historical or communal value. The effect of an application on the significance of a non-designated heritage asset should be taken into account in the planning balance. The site is allocated within the EGNP and is acknowledged as a committed housing site delivering against the Council's 5 year housing supply, as such, it must follow that the balance in favour of the social benefits of the proposal must outweigh the loss of this non-designated heritage asset, which is considered to be of 'fairly limited local importance'.

6.46 The proposal accords with NPPF insofar as it relates to the protection of heritage assets. Whilst policy DP34 seeks the retention, where possible, of non-designated heritage assets, the NPPF requires that this is balanced against its significance. It has been demonstrated that Ashplats House has limited local importance and the social benefits of the proposal outweigh its retention, as such the proposal accords with policy DP34.

Flood Risk and Drainage

6.47 The site is located with Flood Zone 1 with a low probability of flooding, as such, residential development of the site is considered acceptable. There are no watercourses within or adjacent to the application site.

6.48 The application is outline only, however, an indicative drainage strategy is submitted alongside the application, demonstrating how the indicative layout can be achieved, whilst catering for the 1 in 100 year storm event plus have extra capacity for climate change (in this case 40%). MSDC also require the proposed soakaway(s) to have a half drain time not exceeding 24 hours.

6.49 The indicative drainage strategy is informed by intrusive site investigation works undertaken during winter months (undertaken by Lustre Consulting and set out in the accompanying Geoenvironmental and Geotechnical Investigation Report), the details of which are set out in the supporting Flood Risk and Drainage Strategy. The drainage strategies are summarised as follows:

- Infiltration drainage systems are to be used throughout for the disposal of runoff.
- An average infiltration rate of 1.0×10^{-5} m/s has been utilised for evaluation purposes.
- The access road is to remain in private ownership.

- The access road and some (or all if preferred) of the parking provision is to be permeable paving with infiltration (BS 7533-13:2009, Type A).
- Roof drainage to be conveyed and discharged to the ground via soakaways.
- Foul drainage proposed to discharge to existing drain within the southern portion of the site. This then discharges in to the adjacent Barratt Homes strategic infrastructure.

6.50 Foul water drainage will be discharged via an existing foul drain located within the southern portion of the site and into the strategic network constructed for the neighbouring Bluebell Gate. The 30 residential dwellings are estimated to generate average foul flows of approximately 1.4l/s; using the 4000 litres/dwelling/day calculation. It has been confirmed that capacity exists within the pumping station on the adjoining site to serve the new development. A legal agreement, by Transfer and referred to within the Land Registry Titles, allows connection to the pumping station (and other services).

6.51 The accompanying Flood Risk and Drainage Strategy demonstrates that the development follows the sequential approach to flood risk and provides for SuDS, as such, the proposal accords with policy DP41 of the MSDP.

Sustainability

6.52 The site is within 2.5km of the Town Centre, however, existing and well maintained public rights of way exist through Ashplats Wood (a Strategic SANG) to the south of the site and through East Court, which provide a more direct route for pedestrians. East Court also provides a range of recreational uses, such as woodland walking, tennis, football and the weekly Park Run, it also provides informal recreational uses.

6.53 It is within 2km of the nearest primary school (Blackwell Primary School) and only 3km of Sackville Secondary School. There is a range of local employment opportunities within the Town, including the Queen Victoria Hospital approximately 1.5km from the site. A local parade of shops is approximately 1km from the site on Holtye Avenue. The site is therefore considered to be in a highly sustainable location.

6.54 A Sustainability Statement accompanies the application and demonstrates how the development is committed to delivering a sustainable development through construction, including energy efficiency, water efficiency and SuDS, in accordance with policy DP39 of the MSDP.

6.55 The development will meet the social objective of sustainable development through the delivery of 30 dwellings, contributing towards the MSDP housing requirement and 5yr HLS. It will also delivery 80% small dwellings, meets a

need for small family dwellings as identified by the EGNP, and 30% of the scheme provides affordable housing in accordance with the MSDP.

- 6.56 The scheme has been carefully considered to ensure the protection of boundary trees and provides an enhancement through new native planting. It delivers a sustainable urban drainage scheme and there will be no impact on protected species, as such, the proposal maintains and enhances biodiversity. It is considered that the application meets the environmental objectives of sustainable development.
- 6.57 In addition, the development will meet the economic objectives of sustainable development through the New Homes Bonus and construction employment. It will also encourage local spending within the town, through the addition of new residents. The site is well located close to the town centre and its associated employment opportunities, the Queen Victoria Hospital being within walking distance of the site.

7. Conclusions

- 7.1 The site is allocated within the EGNP and identified on the Mid Sussex Proposals Map. It is included as a 'commitment' and identified within the Council's 5 yr HLS. The application is brought forwards in accordance with policy EG6b of the EGNP and as such the principle of development should be considered acceptable.
- 7.2 The application is made in outline with all matters except access reserved for future consideration. However, the submitted layout is a reflection of detailed site assessment, particularly in relation to the boundary trees. It is considered that the layout is a realistic demonstration of the capacity of the site whilst addresses the identified constraints and opportunities of the site. It has been informed by discussions with the Council's Urban Designer and has been broadly supported.
- 7.3 Access will be achieved via Greenhurst Drive, by legal agreement. This has been demonstrated to be acceptable through the Transport Statement submitted in support of the application.
- 7.4 The proposal has been discussed with MSDC and EGTC as part of pre-application discussions and letters have been sent to local residents. MSDC and EGTC have broadly supported the proposals, subject to the details which have been addressed through this planning submission.
- 7.5 It has been demonstrated that the proposal wholly accords with the development plan and we trust that the Council will support the application accordingly.

Appendix A