



June 2021



PLANNING STATEMENT

LAND OFF FRYATTS WAY

BEXHILL

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1 INTRODUCTION

1.1 Scope of this Statement

1.1.1 This Planning Statement has been prepared in support of an outline planning application for the development of Land off Fryatts Way, Bexhill.

1.1.2 The description of development is as follows:

“Outline planning application for up to 210 residential dwellings (including up to 30% affordable housing), introduction of structural planting and landscaping, informal public open space and children’s play area, surface water flood mitigation, vehicular access point and associated ancillary works. All matters to be reserved with the exception of the main site access.”

1.2 The Development Plan

1.2.1 The starting point for the determination of this application is the development plan. Of principal relevance to this application are the Rother Local Plan Core Strategy (2014) and the Rother Development and Site Allocations (DaSA) Local Plan (2019).

1.2.2 The site is outside the settlement boundary for Bexhill in the Core Strategy and the proposed development does not accord with any Local Plan policy that permits residential development outside of settlement boundaries. However, the Council is currently unable to demonstrate a five-year housing land supply and therefore its strategic policies are out of date and, as required by the National Planning Policy Framework (‘the Framework’), planning permission should be granted unless the adverse impacts of the proposal significantly and demonstrably outweigh the benefits.

1.3 Scope of the Planning Application

1.3.1 The outline planning application is seeking approval in principle for the development proposals. Together, the description of development, Design and Access Statement (DAS) and other supporting documents describe the nature and content of the development proposed.

1.3.2 Details of the parameters of the development for which outline planning permission is sought are included within the DAS, ensuring that an appropriate level of information is provided on the scale, nature and general arrangement of the development proposed at the outset.

1.3.3 The following documents have been submitted in support of the planning application:

- Development Framework Plan
- Planning Statement
- Affordable Housing Statement
- Economic Recovery Covid-19 Statement
- Design and Access Statement
- Landscape and Visual Appraisal
- Ecological Appraisal
- Report to Inform a Habitats Regulations Assessment (iHRA)
- Arboricultural Assessment
- Archaeological Desk Based Assessment
- Phase I Preliminary Risk Assessment
- Flood Risk Assessment
- Foul Drainage Analysis
- Utilities Statement
- Air Quality Screening Assessment
- Noise Screening Assessment
- Transport Assessment
- Travel Plan
- Statement of Community Involvement

1.3.4 This Planning Statement explains why development is needed in this location and the significant social, environmental and economic benefits that the

proposal will bring to the area. It also confirms, drawing on the supporting technical information, that no significant and demonstrable adverse impacts would arise, as a consequence of the development, to outweigh these benefits.

1.3.5 The Statement also explains the policy context, including how the proposed development complies with the Framework and why it is appropriate to bring forward development now at this site.

1.4 The Proposal

1.4.1 This Statement is one of a suite of documents submitted to support this application and comprehensively demonstrates the suitability and sustainability of the site for development, as proposed.

1.4.2 The drawings submitted as part of this outline planning application for approval are:

- Site Location Plan (drawing number: 9309-L-01 Rev G)
- Proposed Site Access (drawing number: P001-01)

1.4.3 The application proposal includes the following:

- Up to 210 residential dwellings (including 30% affordable housing delivered in accordance with currently adopted planning policy);
- Structural landscape planting and the retention and positive management of key landscape features;
- 4.39 ha of formal and informal open space (almost 40% of the gross site outline application area);
- A sustainable urban drainage system; and
- New access arrangements, including a range of improvements to enhance pedestrian access.

- 1.4.4 It is proposed that the site will be accessed from Fryatts Way, via a simple priority 'T' junction. It has been confirmed that the required visibility splays can be achieved and that the site access junction will operate comfortably within capacity in both the morning and evening peak periods with the proposed development traffic as demonstrated by the Transport Assessment prepared by Tetra Tech.
- 1.4.5 A range of densities and house types are proposed to meet local need. 30% of the units would be affordable in order to meet the requirement of currently adopted local planning policy. Affordable housing provision will be secured by a Section 106 legal agreement.
- 1.4.6 The illustrative Development Framework Plan for the site demonstrates how the built development will be set within a framework of open space and green infrastructure. The green space will include a locally equipped children's play area and informal open space. The proposal seeks to retain existing landscape features; the existing hedgerows are maintained where possible and any loss would be mitigated elsewhere on site. The Development Framework Plan incorporates these elements within a strategic landscape framework.
- 1.5 EIA Screening
- 1.5.1 As the application proposals are for urban development on a site of more than 5 hectares and greater than 150 dwellings, the proposals fall under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2017. Such projects only require an EIA if the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location.
- 1.5.2 The location does not present any environmental constraints and nor is it in a sensitive area.

1.5.3 The Local Planning Authority will be required to screen the proposals as part of its legal requirements however the applicant does not consider that an Environmental Statement is required.

1.6 Planning History

1.6.1 There is no previous planning history on the proposed site.

2 THE NATIONAL HOUSING CRISIS

2.1 Introduction

2.1.1 It is widely acknowledged at all levels that there is a housing crisis in this country, which has arisen as a direct consequence of too few houses being completed to keep pace with growing population and household formation rates.

2.1.1 While there is often great debate about the delivery of both market and affordable housing, in reality it is about meeting a very basic human need. People wish to be able to live in suitable accommodation which they can afford and in a place that they want to live. Where sufficient housing of a suitable type is not available, this has a real, negative social impact.

2.1.2 As a result of to the COVID-19 pandemic, the country is experiencing an unprecedented time, both socially and economically. What is clear is that the construction industry will be a key driver in the economic recovery from what is widely accepted as being the deepest recession the country has faced.

2.2 Government's Response to the Housing Crisis

2.2.1 The current Conservative Government was elected in 2017 with a manifesto pledge to meet the 2015 commitment to deliver one million homes by the end of 2020 and to "deliver half a million more by the end of 2022" (equating to approximately 200,000 new homes per annum).

2.2.2 This commitment fell short of the number of homes identified by the National Housing Federation, the research of which indicated that 245,000 new homes per annum would be required. Later, at the 2017 General Election, all three major parties had manifesto commitments to build between 200,000 and 300,000 new homes per annum.

- 2.2.3 Since the start of the financial crisis during the first decade of this century the delivery of new homes has not yet come close to delivering this nationally recognised need. Considering past completion rates, it is self-evident that a significant step-change is required in the delivery of new homes in order to get anywhere close to meeting requirements and preventing the housing crisis from being exacerbated further.
- 2.2.4 Through its manifesto in late 2019, the Conservative Government restated its ambition to deliver 300,000 homes a year from the mid-2020s.
- 2.2.5 This target of 300,000 homes was affirmed in the 'Planning for Future' consultation launched in August 2020. In his Foreword to this paper, the Rt. Hon. Robert Jenrick MP wrote:
- 2.2.6 "Our proposals seek a significantly simpler, faster and more predictable system. They aim to facilitate a more diverse and competitive housing industry, in which smaller builders can thrive alongside the big players, where all pay a fair share of the costs of infrastructure and the affordable housing existing communities require and where permissions are more swiftly turned into homes."
- 2.2.7 The Government has been clear that recovery from the substantial economic damage caused by the coronavirus restrictions is a matter of paramount importance. In the opening to his Written Ministerial Statement on 13th May 2020, the Secretary of State made clear that:
- "The planning system has a vital role to play in enabling the delivery of housing and economic growth that will support the UK's economic recovery."**
- 2.2.8 Construction has been identified as a key sector to drive recovery from the coronavirus pandemic. Increased housebuilding played a major part in the

recovery from the 2008 financial crisis and the same applies with increased force in the present circumstances.

2.2.9 This application responds to the national housing crisis and the need to grant additional planning permissions in order to meet the Government’s objectives. In addition, as will be explained later in this Planning Statement, this document responds to the local housing issues in Wealden Borough which are contributing to the problem overall.

2.3 Affordability of Housing in Rother District

2.3.1 One effect of the national housing crisis is a profound effect on affordability. The following information, based on MHCLG ‘live tables’, demonstrates that the Council is failing to deliver the number of affordable homes each year that it needs. This has led to the increasing unaffordability of housing in the district since the start of the Local Plan period in 2014.

2.3.2 Mortgage lenders typically offer loan-to-income ratios from 3.25 times annual salary up to a cap at around 4.5 times annual salary. Often, this requires a deposit and loan-to-value ratio of 95%. The failure to deliver the required number of homes in the district has negatively affected the affordability of housing in the district since the start of the plan period in 2014, as demonstrated by the loan-to-income ratios in the table below¹.

Year	2014	2015	2016	2017	2018	2019	2020
Loan to income ratio	9.14	9.45	10.01	9.27	10.33	9.96	10.66

¹ Office for National Statistics – House price to workplace-based earnings ratio. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian> [Accessed 25/06/2021].

2.3.3 The most recent Strategic Housing Market Assessment for Rother (Hastings and Rother Strategic Housing Market Update: Housing Needs Assessment June 2013) indicates a need for circa 97 affordable dwellings per annum. MHCLG live table 1011C² provides a detailed breakdown of new build affordable housing completions by local authority. Live table 1011 shows that since recording began in 1991/92, Rother District Council (RDC) has only achieved this target four times. For example, delivery rates have been low during the past five years:

Year	Total Affordable Completions
2015/16	103
2016/17	20
2017/18	56
2018/19	60
2019/20	130

2.3.4 The reality is therefore that those most in need in Rother District are unable to afford to buy their own homes.

² <https://www.gov.uk/government/statistical-data-sets/live-tables-on-affordable-housing-supply> [Accessed 21/06/2021].

3 SITE AND LOCATIONAL SUSTAINABILITY

3.1 Site Location

3.1.1 The 11.29ha site lies adjacent to the existing residential development on the edge of Bexhill.

3.1.2 The settlement of Bexhill is situated approximately 8km (5 miles) west of Hastings; and 19km (12 miles) east of Eastbourne.

3.2 Suitability of Location

3.2.1 The application site comprises fields in agricultural use. As outlined above, it is well related to the settlement, with suitable routes for pedestrian and cyclists and it is contained by physical features. The development would represent a logical extension to Bexhill.

3.2.2 As a settlement, Bexhill is considered a suitable location for development. The settlement is identified as the principal settlement to direct growth towards and the only settlement in the first tier in the adopted Core Strategy settlement hierarchy. It can be considered the most sustainable settlement in Rother District, especially given that the High Weald AONB constraining approximately 90% of the district.

3.2.3 The site access is situated within approximately 2km from of the centre of Bexhill and it is therefore close to existing shops, services and employment opportunities in the village allowing easy access by foot and bicycle. The site's proximity to key services and facilities is shown on the Facilities/Services Plan in the Design and Access Statement (page 15) and details of facilities are shown within the Transport Assessment, which illustrates that many amenities are within acceptable guideline walking distances.

- 3.2.4 Bexhill has a number of services and facilities which are within easy walking and cycling distance of the site, including: schools, post offices, convenience shops, restaurants, bars and pubs, a TESCO Express, medical centres, Bexhill Leisure Centre and outdoor play areas. The Little Common Shopping Area, within which there are several shops, café, restaurants, barber shops and clinics, is also located within the site's 2km walk catchment. Additionally, a Lidl supermarket is located just at the edge of the 2km walk catchment.
- 3.2.5 Further detail regarding public transport services can be found in section 5.5 of this Statement and in the Transport Assessment.
- 3.2.6 The following is relevant in terms of the site's suitability and sustainability for development:
- The site is well contained within the landscape and important trees and other landscape features are retained;
 - The local highway network has capacity to accommodate the additional traffic associated with the development, without adverse impact;
 - The site comprises land in agricultural use, but its usefulness for agricultural purposes is limited and its loss would not be significant;
 - The site has a low ecological value. The loss of habitat would therefore not be significant and mitigation and net biodiversity gains could be readily achieved;
 - The application site falls within the Flood Zone 1 (i.e. land assessed as having a less than 1 in 1,000 annual probability, or <0.1% chance of flooding);
 - There are no designated heritage assets within or immediately adjacent to the site, and the development is not considered to affect the setting of any listed buildings.

3.2.7 The DAS submitted in support of the application sets out how the site can accommodate the quantum of development proposed in a manner which reflects the local landscape character and the edge of Bexhill.

3.3 Sustainability Summary

3.3.1 In summary the application site presents an opportunity for the sustainable growth of Bexhill because:

- The land to which the development proposals relate is not of high environmental value;
- The site is suitable for residential development in terms of its general location and characteristics; and
- There are opportunities through development to improve the environmental conditions of the area.

4 PLANNING POLICY CONTEXT

4.1 Development Plan

4.1.1 Section 38(6) of the Town and Country Planning and Compulsory Purchase Act 2004 places a statutory duty on local planning authorities (LPAs) to determine planning applications in accordance with the development plan unless material planning considerations indicate otherwise. Section 39 of the Act requires decision makers to exercise their functions with the objective of contributing to the achievement of sustainable development.

4.1.2 At the time of writing, the principal documents of the adopted development plan applicable to the site are:

- Rother District Local Plan (2006) saved policies;
- Rother Core Strategy (2014); and
- Development and Site Allocations Local Plan (2019).

4.1.3 This section examines the development plan, as applicable to the application, and considers the relevance and weight that should be attributed to its policies. In determining the weight to relevant policies, the guidance at paragraph 213 of the Framework confirms:

“...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).”

4.2 Five-Year Housing Land Supply

4.2.1 The supply of available and deliverable sites for housing in Rother District is a material consideration in determining the weight to relevant policies. Paragraph 11 and footnote 7 of the Framework state, respectively, that:

“Plans and decisions should apply a presumption in favour of sustainable development.

...

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, granting 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 taken as a whole.
”

...

“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 (with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. Transitional arrangements for the Housing Delivery Test are set out in Annex 1.”

- 4.2.2 The Framework requires LPAs to ensure a continual supply of land to meet five years' worth of housing requirements, with a delivery buffer of either 5%, 10% or 20% (depending on past performance). Local authorities should also make every effort to redress previous underperformance within the immediate five-year period (commonly referred to as the 'Sedgefield approach') and the delivery buffer should be applied to both the requirement and the accrued backlog.

4.2.3 The Council is currently only able to demonstrate a five-year supply of 2.87 years, as confirmed through its 'Housing Land Supply Position Statement' published in November 2020. Therefore, as stated within paragraph 11 of the Framework, the presumption in favour of sustainable development applies.

4.2.4 The latest Housing Delivery Test results, published in January 2021, confirm that due to significant under-delivery during the last three years, Rother is required to apply a 20% buffer to its housing requirement when calculating its five-year supply position.

4.2.5 The market and affordable homes proposed on the site could make a significant contribution to housing supply in Rother and Bexhill during the next five years, helping to address the immediate lack of a five-year supply of deliverable housing sites.

4.3 Rother District Saved Policies (2006) Local Plan

4.3.1 The Rother Local Plan was adopted in July 2006 and was prepared in line with the Planning and Compulsory Purchase Act 2004. A number of Local Plan policies were 'saved' by direction of the Secretary of State in June 2009. At a Council Cabinet meeting on the 2nd of July 2016, a list of saved Local Plan policies were considered to be consistent with the Framework and acceptable to use until superseded by emerging Local Plan documents.

4.3.2 Appendix 1 of the Rother District Core Strategy and Appendix 2 of the Rother District Development and Site Allocations Local Plan respectively provide a list of the Local Plan Policies which were superseded upon its adoption.

4.4 Rother District Core Strategy

4.4.1 The Rother District Core Strategy was adopted in September 2014. The Core Strategy provides the overarching spatial strategy for the district over the

period 2011-2028. The district is highly constrained, with 90% of it being either in an Area of Outstanding Natural Beauty or other nationally or internationally area designated for its nature conservation value.

- 4.4.2 The strategic policies of principal relevance to this proposal are discussed below.
- 4.4.3 Policy OSS1 makes provision for 5,700 new homes in Rother from 2011-2028. This policy goes on to state that the spatial distribution strategy primarily focuses new growth at Bexhill, anticipating development of approximately 3,100 dwellings over the plan period as set out in Policy BX3.
- 4.4.4 Given the inability of RDC to demonstrate a five-year housing land supply, policies OSS1 and BX3 are out of date in Framework terms³, which reduces the weight that should be afforded to them and the application should be considered in the context of paragraph 11dii of the Framework (see 4.2.1).
- 4.4.5 Policy OSS2 sets out the use of settlement boundaries to differentiate between areas where most forms of new development would be acceptable and where they would not. The settlement boundary for Bexhill was amended through the DaSA (2019) and is defined on the DaSA Policies Map.
- 4.4.6 Policy OSS4 provides general development criteria for proposals to meet. In compliance with this policy, the proposals have carefully considered the amenity of nearby adjacent residential uses, incorporates areas of open space and is of a relatively low density which reflects neighbouring uses.
- 4.4.7 Policy BX1 provides the overall strategy to deliver the Plan's objectives for Bexhill. The policy seeks to provide housing growth, with particular regard to the needs of families, affordable housing for younger people and a range of

³ Footnote 7.

supported housing options for older households. The proposals include up to 30% affordable housing and a mix of tenures.

4.4.8 There are also several other policies that are relevant to this application:

- Policy EN1 – Landscape Stewardship
- Policy EN2 – Stewardship of the Built Environment
- Policy EN3 – Design Quality
- Policy EN5 – Biodiversity and Green Space
- Policy EN7 – Flood Risk and Environment
- Policy TR2 – Integrated Transport
- Policy TR3 – Access and New Development

4.4.9 The suite of reports submitted in support of the planning application demonstrate how the proposals meet the requirements of the above policies.

4.5 Rother Development and Site Allocations Local Plan (2019)

4.5.1 The Rother Development and Site Allocations (DaSA) Local Plan was adopted in December 2019 and supplements the policies in the Rother Core Strategy. Some settlement boundaries were updated through the DaSA, including that for Bexhill.

4.5.2 Policy DIM2 sets out that development will be focussed within the defined settlement boundaries. Where development falls outside of those settlement boundaries, development must accord with specific Local Plan policies or that for which a countryside location is demonstrated to be necessary. As a matter of principle, the application proposal directs housing development to a location that it outside defined settlement limits and therefore in the 'countryside' for the purposes of applying policies OSS2 and DIM2. The

proposed development is therefore in conflict with Policy DIM2. However, these policies have the effect of constraining housing development at a time when housing requirements are not being met and need to 'flex' significantly. Settlement boundaries should not be seen as inviolable in this context and, as a matter of principle, sustainable development should not be resisted by virtue of it being located outside of defined settlement boundaries and thus in the 'countryside'.

4.5.3 Indeed, the Council accepts that it cannot demonstrate a five-year housing land supply; therefore, the policies most important for determining the application are out of date and the presumption in favour of sustainable development set out in paragraph 11dii of the Framework is applicable.

4.5.4 Policy DHG1 of the DaSA sets an affordable housing requirement of 30% for developments of net 15 dwellings or more in Bexhill. The development proposals comply with this requirement, offering 30% affordable housing, which would comprise a mix of tenures to be agreed with RDC.

4.5.5 Policy DHG6 sets a requirement for development sites of 20 dwellings or more to make provision for 5-10% of the total number of dwellings to be made available as serviced plots for self and custom housebuilders. In line with this policy, 5% of plots will be made available for this purpose.

4.5.6 A number of other development management policies in the DaSA are relevant to this outline application:

- Policy DEN1 – Maintaining Landscape Character
- Policy DEN4 – Biodiversity and Green Space
- Policy DEN5 – Sustainable Drainage
- Policy DEN7 - Environmental Pollution

- Policy DIM1 – Comprehensive Development
- Policy DIM2 – Development Boundaries

4.5.7 The suite of reports submitted in support of the planning application demonstrate how the proposals meet the requirements of the above policies.

4.6 Weight to be afforded to adopted policies

4.6.1 Contrary to the Framework, the relevant policies of the Rother Core Strategy (2014) and the saved policies of the Rother District Local Plan (2006) fail to plan for a level of housing based on current housing need of the district.

4.6.2 As RDC cannot demonstrate a five-year supply of housing land, in accordance with paragraph 73 of the Framework, the most important policies for the determination of the application, including housing policies, should not be considered up to date.

4.6.3 The proposals are considered to comply with the remainder of relevant, up-to-date development plan policies.

4.7 Emerging Local Plan

4.7.1 The Council has begun early preparatory work on a new Local Plan that will cover the period 2019-2039.

4.7.2 A call for sites exercise has taken place, and the development site has been submitted for consideration as a residential allocation.

4.7.3 The Council are intending to consult upon a draft raft Local Plan in Quarter 3/4 of 2021/22. The Local Development Scheme (updated March 2021) suggests that the new Local Plan is not likely to be adopted until Quarter 3 2023/24 at the earliest.

4.7.4 At this stage there are no emerging policies, therefore the emerging plan cannot be afforded weight in the decision-making process.

4.8 Summary of the Development Plan

4.8.1 In the light of the above, it is clear that the development proposal accords with all parts of the development plan that are up to date.

4.8.2 Where a conflict arises, those policies out of date in Framework terms and should be afforded reduced weight accordingly.

4.8.3 The application therefore should be approved without delay.

5 SUSTAINABLE DEVELOPMENT: THE NATIONAL PLANNING POLICY FRAMEWORK

5.1 Introduction

5.1.1 The Government published a revised Framework in July 2018, which was updated with minor revisions in February 2019.

5.1.2 This section of the Statement sets out how the planning application meets with the objectives of the Framework in delivering sustainable development.

5.2 The Presumption in Favour of Sustainable Development

5.2.1 At the heart of the Framework is the 'presumption in favour of sustainable development' (paragraph 11). For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay; or where the policies which are most important for determining the application are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits or where policies in the Framework indicate that development should be restricted.

5.2.2 The relevant technical reports that accompany this planning application demonstrate that there would be no unacceptable adverse impacts that would significantly and demonstrably outweigh the benefits associated with the proposals. Further, the application site is not the subject of, and would not adversely affect, any of the designations cited within footnote 6 of the Framework and therefore policies do not apply which indicate the presumption should be disapplied.

5.3 Delivering a Sufficient Supply of Homes

5.3.1 The Framework sets out the Government's key housing objective of significantly boosting the supply of housing. Paragraph 73 sets out how LPAs should achieve this boost in the supply of housing, including a requirement to provide a delivery buffer of 5%, 10% or 20% to ensure choice and competition in the market for land.

5.3.2 RDC cannot currently demonstrate a five-year supply of deliverable housing sites, as required by national policy. In addition, the latest Housing Delivery Test results (January 2021) indicate that due to significant under-delivery in the last three years, Rother is required to apply a 20% buffer to its housing requirement in calculating its five-year supply position. Due to its HDT score, the Council is required to produce an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years (Framework paragraph 75). The proposals entirely accord with this national policy objective insofar as the application will deliver new housing development which will assist the Council to contribute towards the central Government objective of boosting significantly the supply of housing now.

5.4 Building a Strong, Competitive Economy

5.4.1 The Framework is clear that the Government is committed to delivering sustainable economic growth, identifying (at paragraph 81) that planning policies should positively and proactively encourage sustainable economic growth.

5.4.2 Housing development is a key component of economic growth and this is fully recognised in Government policy and the 2017 housing white paper, which states on page 15:

“If we fail to build more homes, it will get ever harder for ordinary working people to afford a roof over their head, and the damage to the wider economy will get worse.”

5.4.3 Through the development of the site, a significant amount of investment would be made to the area in terms of the construction value of the project and associated spend during the construction period. The construction industry, and housebuilding in particular, make an important contribution to both the local and national economy in terms of job creation. The accompanying ‘Economic Recovery Following Covid-19’ document estimates the following key benefits arising from the proposal:

- Construction spend – circa £28.38 million
- GVA over the build period – £10.66 million
- Resident annual expenditure – £7.6 million
- Council Tax – £3,500,000 over 10 years
- New Homes Bonus – £1,100,000 over a 4-year period

5.4.4 The provision of high-quality housing in Bexhill is central to the achievement of sustainable economic growth across the Rother district and is fully supported by the requirements and advice of the Framework; indeed, paragraph 80 is clear that significant weight should be placed on the need to support economic growth through the planning system.

5.5 Promoting Sustainable Transport

5.5.1 At paragraph 102, the Framework requires LPAs to consider transport issues from the earliest stages of the plan-making process and development proposals, encouraging opportunities to promote walking, cycling and public transport use.

5.5.2 At paragraph 103, to the Framework requires significant development to:

“...be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”

- 5.5.3 Bus stops are located approximately 600m to the southeast of the site from where bus services to Bexhill town centre can be caught. More regular services to various local and regional destinations including Battle, Hastings, Polegate, and Eastbourne can be caught from bus stops located within 2km of the site.
- 5.5.4 In addition to the regular bus services set out above, there is also a ‘Dial-a-Ride’ community bus service that can be called by people with any type of disability regardless of age who cannot use regular public transport.
- 5.5.5 Regular train services operate from Bexhill Rail Station to Eastbourne, Lewes, London Victoria, Gatwick Airport, and Ashford International.
- 5.5.6 To support the application, a Transport Assessment has been undertaken which confirms that the site is well located in relation to sustainable transport options and is well positioned in relation to the local and strategic highway network.
- 5.5.7 The Transport Assessment illustrates that the assessed junctions would operate within capacity and would adequately accommodate development proposals. The increase in traffic arising from the development would not unacceptably impact the local road network.
- 5.5.8 The Transport Assessment confirms that the package of measures proposed offers accessibility enhancements to encourage more sustainable means of travel in the area and will mitigate any significant impacts on the highway.

5.6 Achieving Well-Designed Places

5.6.1 The DAS demonstrates how the scheme will deliver a high-quality residential sustainable development. The proposals are based on sound design principles that have considered the constraints and opportunities presented by the site.

5.6.2 Whilst design is a matter reserved for future determination, the DAS demonstrates that the site could accommodate a scheme that would be in keeping with the scale and character of its surroundings and Bexhill, through delivering dwellings of a suitable size and utilising materials that reflect the local vernacular.

5.6.3 It is demonstrated through the DAS and Transport Assessment that the site would be accessible to people on foot, cycle and to those with disabilities. The illustrative masterplan seeks to create an attractive place that responds to the attributes of the site and the local context.

5.6.4 The development has been designed considering the recommendations of the Landscape and Visual Appraisal (LVA). The green infrastructure within the built development would sit as an integral part of the framework and would create an accessible, open and engaging place within which to live. The proposal provides a strong green framework comprising the creation of 4.39ha of green infrastructure and the reinforcement of existing hedgerows around the site boundary to improve the quality and connectivity of habitat.

5.7 Meeting the Challenge of Climate Change

5.7.1 In September 2019, RDC declared a climate change emergency and committed to becoming carbon neutral by 2030. In response, the scheme provides green infrastructure which can help to adapt and mitigate climate change impacts and ensure flood resilience.

5.7.2 Paragraph 148 of the Framework requires the planning system to help to shape places in ways that contribute to radical reductions in greenhouse gas emissions.

5.7.3 The application proposal will be delivered to the relevant building regulations (or equivalent standard applicable at the time of permission).

5.8 Conserving and Enhancing the Natural Environment

Landscape

5.8.1 The site is not subject to any landscape quality designation and lies outside of any National Park or Area of Outstanding Natural Beauty. Neither the site nor the immediate landscape contains any rare or unusual landscape features and so the LVA prepared for the application concludes the site does not comprise a valued landscape.

5.8.2 The proposals reflected in the Development Framework Plan have been sensitively designed with consideration given to the findings of the LVA. The proposals have been designed to ensure that the development is set within a substantial green infrastructure network. Although the proposals will alter the character of the site itself through the loss of green fields, it is considered that the proposed development will not be out of scale or context with the nature of the landscape within which is proposed to be located; within an area which is relatively well-contained and subject to influences from neighbouring development. Overall, the site is considered to have capacity to accommodate a well-designed and considered development.

Habitats Sites

5.8.3 As identified in the shadow Habitats Regulations Assessment (iHRA) submitted with the planning application, a number of European designations are located within the vicinity of the site. In particular, the iHRA identifies the Pevensey

Levels SAC/ Ramsar as potentially subject to likely significant effects as a result of the proposed development. The iHRA therefore sets out the required information to allow an Appropriate Assessment of the proposed development on the Pevensey Levels SAC/ Ramsar.

5.8.4 In relation to habitats sites, paragraph 177 of the Framework states:

“The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.”

5.8.5 Potential effects as a result of pollution of surface water run-off are identified in relation to the SAC. Accordingly, the iHRA provides an assessment of waterborne pollution effects resulting from the proposed development alone and in combination with other projects. The assessment finds that the proposed development, either alone or in combination with other plans or projects, is not considered to result in an adverse effect on integrity at the SAC.

5.8.6 In order to avoid or reduce effects, the iHRA proposes mitigation measures, i.e. policy compliant pollution prevention controls during construction and operation of the proposed development.

5.8.7 In sum, it is considered that the detrimental effects on European designations, both alone and in combination, would be avoided such that taking into account the designations' objectives, the proposed development would have no adverse effects on their integrity. Therefore, there is no harm to weigh in the planning balance and the presumption in favour of sustainable development should remain engaged.

Biodiversity

- 5.8.8 Core Strategy policy EN5 states that the Council will work with partners to maximise opportunities to achieve a net gain in biodiversity and sustain wildlife.
- 5.8.9 The Ecological Appraisal finds that the site is of low ecological value and predominantly comprises semi-improved pasture, some of which is heavily grazed by horses. Trees, scrub, and semi-improved grassland around the site boundaries are to be retained and enhanced where possible. The proposed development would provide additional planting to create wildlife corridors around the site, as well as providing connections through the development.
- 5.8.10 Biodiversity enhancements would be achieved through general enhancements within the site, as outlined in the Ecological Appraisal. This would result in an overall net gain in biodiversity as a result of the development.

5.9 Conserving and Enhancing the Historic Environment

- 5.9.1 Section 16 of the Framework provides policy guidance on the conservation and investigation of heritage assets.
- 5.9.2 The Archaeological Desk Based Assessment concludes that there is no evidence to suggest significant archaeological remains are likely to be present within the Site. The Archaeological Desk Based Assessment considers that the potential archaeological resource of the site can be further investigated and mitigated at the post-determination stage. A requirement for archaeological work can be secured by way of one or more planning conditions.
- 5.9.3 The Archaeological Desk Based Assessment identifies that no designated heritage assets are located within the site. Designated heritage assets in the 1km study area comprise Grade II listed buildings, including four dwellings and the remains of a windmill. The proposed development would result in no

harm of the significance of these assets. In light of the above, it can be soundly concluded that neither archaeology nor built heritage represents a constraint to the proposed development of the site.

5.1 Summary

5.1.1 From the above, it is clear that the application proposal complies with relevant provisions of the Framework. Accordingly, it can reasonably be concluded that the proposal is also in compliance with the broad planning objectives of the Framework.

5.1.2 The assessment against the relevant policies does not indicate any circumstances under which permission should be restricted which might result in the disapplication of the presumption in favour of sustainable development.

6 Planning Balance and Conclusions

6.1 Planning Balance

- 6.1.1 This outline planning application is made in the context of the Government's requirement to boost housing land supply and the presumption in favour of sustainable development. The proposal responds positively to the identified lack of a five-year housing land supply in Rother and the identified needs for both market and affordable housing in the authority.
- 6.1.2 Footnote 6 of the Framework provides a closed list of the policies of the Framework which protect assets of particular importance, including habitats sites, and have the potential to disapply the 'tilted balance' of paragraph 11d. The applicant does not consider that any of these policies are engaged in this case.
- 6.1.3 It is acknowledged that the proposal constitutes a departure from the development plan because the site lies outside of the settlement boundary for Bexhill. However, as a consequence of the lack of five-year housing land supply, the most important policies for determining the application, including strategic housing policies, are out of date and the tilted balance of paragraph 11dii applies, whereby planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 6.1.4 This proposal would be deliverable in the short term and would increase the supply and choice of housing in Bexhill. It would contribute towards economic growth and have wider social benefits to the local community, meeting a range of housing requirements, including affordable housing. The principles outlined within the DAS would secure a high-quality scheme.

6.1.5 The supporting material, assessments and reports demonstrate that there are no technical or environmental constraints that would preclude the development of this site, subject to planning conditions and/or obligations. Gladman is willing to enter into constructive dialogue with the Council to agree a list of conditions and draft heads of terms for a Section 106 legal agreement that are necessary to make the development acceptable in planning terms.

6.1.6 The development of the site, as proposed, would be both suitable and sustainable, and there is justification to grant planning permission in accordance with the presumption in favour of sustainable development.

6.2 Benefits

6.2.1 The table below highlights some of the key benefits arising in respect of the application proposal:

Market Housing	It will help to deliver much-needed new homes, in a community where people wish to live, in a suitable and sustainable location close to existing public transport, shops, employment opportunities and community services.
Affordable Housing	It will provide a wide range of homes including a policy-compliant provision of affordable housing (30% or up to 63 units) in an area where there is an existing unmet need unlikely to be delivered through alternative means.
Jobs and the Economy	<p>Immediate Impacts</p> <p>The build cost for the development is expected to be around £21.7m. Calculations suggest that this construction expenditure would support around 175 Full Time Equivalent (FTE) construction jobs over the period of the build.</p> <p>The development of new homes in the proposed development could help to address local unemployment in the industry and provide apprenticeship and training opportunities for young unemployed people.</p>

	<p>Over the four years following the completion of the development, Rother District Council will benefit from circa £1,100,000 via the New Homes Bonus.</p> <p>Lasting Impacts</p> <p>It is anticipated that 196 of residents from the new development will be of working age and in employment. Household expenditure from the 210 new homes would be circa £7.66 million per year.</p> <p>The scheme will supply new affordable rented and intermediate housing, helping to address substantial local affordable housing needs by providing opportunities for lower income households to own their own home or to secure rented accommodation.</p>
<p>Protecting and enhancing Vitality and Viability</p>	<p>The new residents will increase demand for and use of local services and businesses and increased spending will help to protect, maintain and enhance the services available and accessible within the town and surrounding area.</p> <p>There is no associated impact on the town centre from the local centre proposed on site.</p>
<p>Public Open Space and Recreation</p>	<p>It will provide formal and informal public open space and green infrastructure and secure its long-term management for use by the new and existing community. It will improve connectivity and access to public rights of way.</p>
<p>Environmental Benefits</p>	<p>Biodiversity of the site will be protected, diversified and improved through new hedgerow and tree planting and delivery of new garden spaces and formal and informal green spaces. Overall, the proposal will achieve a net gain in biodiversity.</p>
<p>Accessibility</p>	<p>A range of improvements to enhance pedestrian accessibility.</p>

6.3 Harms

6.3.1 The supporting material, assessments and reports demonstrate that there are no unacceptable adverse impacts associated with the proposed scheme.

6.3.2 As with any greenfield site, the development will introduce changes to the area and have some urbanising effects and it will involve the loss of some

agricultural land. However, this is to be expected and the LVA demonstrates that the scheme could be delivered without unacceptable wider landscape and visual impacts.

6.3.3 It is acknowledged that the construction stages of the development may have some effects which are short-term, temporary in nature, and local to the site and immediate area. In any event, best practice measures would be put in place to mitigate any adverse temporary impacts in terms of noise, the operation of construction traffic, plant and machinery or the management of any other related disturbance or nuisance. This is likely to include controls on working hours and dust suppression measures.

6.3.4 Despite these changes, significant and demonstrable harm will not arise through development overall as proposed.

6.4 Conclusions

6.4.1 The Framework policies on the delivery of sustainable housing development carry significant weight and the delivery of the proposed development would support housing and economic development objectives and meet the aims and objectives of sustainable development, securing net gains across all three strands of sustainable development (economic, social and environmental).

6.4.2 There are no technical or environmental impacts that would significantly or demonstrably outweigh the substantial benefits of the proposal and specific policies of the Framework and development plan do not indicate that development should be restricted.

6.4.3 In accordance with paragraph 11 of the Framework, the development proposal clearly constitutes 'sustainable development'.

6.4.4 Accordingly, it is clear there are significant material considerations supporting the proposal, alongside its compliance with up-to-date provisions of the development plan, and the planning application should therefore be approved without delay.



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