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Planning Feasibility Study

Blatchington House, Firle Road, Seaford, East Sussex, BN25 2HH

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Introduction

1.1 This planning feasibility study is for the building and land at Blatchington House, Firle Road, Seaford, East Sussex, BN25 2HH (see Appendix A).

1.2 Stiles Harold Williams Planning Consultancy Department has been instructed to assess the likelihood of obtaining alternative planning permissions in relation to the land and buildings.

1.3 The site is located within the Lewes District Council whom will be the determining authority for any future planning applications.

1.4 To fulfil the Planning Consultancy Department’s brief, SHW have undertaken an appraisal of extant and emerging local and national planning policy, submission of the pre-application documents and attending meeting with Lewes District Council to determine the likelihood of obtaining planning permission for alternative uses.
2.0 Site Description

2.1 The site is currently occupied by a large single dwelling used as a nursing care home (Use Class C2) and its grounds. Originally built in 16th century as a farmhouse, it was adopted to the current use in 1986.

2.2 The current nursing home is able to accommodate 34 residents in 30 individual and 2 shared rooms with only 6 rooms having en-suite facilities. This is no longer an appropriate level of facilities to be able to provide a high quality care and safe environment nursing home is intended to offer.

2.3 The site is located closely to the centre of Seaford seaside, 3.5 miles away from Newhaven in the west and 9.5 miles from Eastbourne.

2.4 Seaford railway station is half a mile from the site, providing a regular service to Newhaven, Lewes and Brighton with further direct services to several London terminus. The closest bus stop is 200 metres away with an easy access to the town centre.

2.5 Vehicular access to the site is directly from Firle Road. There are a significant number of car parking spaces on site.

2.6 The local planning authority is Lewes District Council and the site is subject to the following site designations:

- East Blatchington Conservation Area;
- Area of Established Character (bordering to the west);
- Site of Local Archaeological Interest (bordering to the south).

2.7 Limited planning history records are available online however the following are considered to be broadly relevant to this report. The planning history available demonstrates that several permissions have been granted for changes and intensification or the site and surrounding lands.
LW/11/0961

Erection of two detached annexes (renewal of extant planning approval LW/08/0689 & LW/03/0816).

Approved - 15 Dec 2011

This consent has not been implemented. It will expire on 14 December 2014.

LW/10/1171

Erection of a detached house with dormer windows and rooflights at front and rear (material amendment to planning approval LW/05/1182) (Land Adjacent to Blatchington House).

Approved - 26 Jan 2011

This application forms part of now separate plot to the south of the site.

LW/08/0689

Erection of two detached annexes (renewal of planning permission LW/03/0816).

Approved - 12 Aug 2008

This consent has not been implemented.

LW/06/1308

Erection of two detached five bedroom houses with integral garage & two detached four bedroom chalet bungalows with detached garage (Land Adjacent to Blatchington House).

Refused - 11 Jan 2007

Appeal Dismissed
This application forms part of now separate plot to the south of the site.

**LW/05/1182**

Erection of two detached dwellings each with double garage off new drive (renewal of unimplemented planning permission LW/00/0925).

Approved - 20 Jul 2005

This application forms part of now separate plot to the south of the site.

**LW/04/0542**

Erection of a three storey extension to rear

Approved - 11 May 2004

**This consent has not been implemented.**

**LW/03/0816**

Erection of two detached annexes, one x two storey and one x single storey.

Approved - 09 Jun 2003

**This consent has not been implemented.**

**LW/00/0925**

Erection of two detached dwellings each with double garage off new private drive.

Approved - 13 Jul 2000

This application forms part of now separate plot to the south of the site.

**LW/00/0170**

Erection of three detached houses each with double garage off new private drive.
Refused - 27 Mar 2000

This application forms part of now separate plot to the south of the site.

**LW/83/0103**

Planning and Building Regulations Application for extension to residential home for the elderly, including three additional residents’ rooms.

Approved - 8 Mar 1983

It is considered that this consent has been implemented and now forms part of the existing building.

**LW/82/1917**

Conversion of garages into staff bungalow.

Approved - 9 Feb 1983

**LW/76/0186**

Planning and Building Regulations applications for alterations to garage.

Approved - 9 Mar 1976

It is considered that this consent has been implemented.

**S/73/0355**

Outline application for old peoples housing consisting of sixteen flats in four 2-storey blocks of four flats and eight bungalows.

Refused - 3 Jan 1974

**S/72/0080**

Planning and Building Regulations application for application for an extension.
Approved – 2 Mar 1972

S/70/0263

Planning and Building Regulations application for extension to Matron's bungalow.

Approved – 1 Oct 1970

S/53/0128

Planning and Building Regulations application for change of use from a private hotel to a home for aged and infirm people and installation of lift.

Approved – 30 Nov 1953

This consent has been implemented and defines the current use of the site.
3.0 Planning Policy

3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states any determination should be made in accordance with the Development Plan unless material considerations indicate otherwise.

3.2 The local planning authority is Lewes District Council and the Lewes District Local Plan (adopted 2003) comprises of the policies saved in 2012 review.

3.3 The proposal has been considered within the context of National, Local and emerging planning policy, and the key policies are summarised below.

National Planning Policy

3.4 The National Planning Policy Framework (NPPF) was published and adopted on 27 March 2012. The NPPF replaces a plethora of Planning Policy Guidance (PPGs) and Planning Policy Statements (PPSs) into a singular concise framework.

3.5 The NPPF must be taken into account in the preparation of local and neighbourhood plans and is a material consideration in the determination of planning applications.

3.6 Paragraph 7 outlines that there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles. With regards to social, this includes supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment.

3.7 Paragraph 9 states that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life, including (but not limited to):
• replacing poor design with better design;

• improving the conditions in which people live, work, travel and take leisure; and

• widening the choice of high quality homes.

3.8 Paragraph 17 sets out the 12 planning principles which underpin the national framework. These include, among others:

• proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;

• always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;

• encourage the effective use of land by reusing land that has been previously developed (brownfield land);

• actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

3.9 Paragraph 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.
3.10 Paragraph 56 states that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Furthermore, paragraph 60 states that planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles.

3.11 Paragraph 131 states that in determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

- the desirability of new development making a positive contribution to local character and distinctiveness.

**Local Planning Policy**

**Lewes District Local Plan**

3.12 The Lewes District Local Plan was adopted in March 2003 and sets out the current planning strategy for the District. It is under review and will ultimately be replaced by the Local Development Framework.

3.13 On the 27th March 2012 (as mentioned above), the Government published the National Planning Policy Framework (NPPF). In light of this, Lewes District Council has undertaken a review of its 'saved' Local Plan policies to determine whether they are consistent with the NPPF. A report was considered and approved by the Lewes District Council Cabinet on the 17th April (See Appendix B). This report is intended to provide clarity as to how the
District Council will utilise the saved Local Plan policies in the determination of planning applications.

3.14 Saved and NPPF Compliant Policy ST3 states that “development requiring planning permission will be expected to comply with the following criteria, and be supported by justification statements where necessary:

- development should respect the overall scale, height, massing, alignment, site coverage, density, landscaping, character, rhythm and layout of neighbouring buildings and the local area more generally;

- materials should be of a quality, type, colour and design which is appropriate to the character of the local area;

- development, including conversion, should respect the amenities of adjoining properties in terms of noise, privacy, natural daylight, and visual amenities and smell;

- development should not result in detriment to the character or the amenities of the area through increased traffic levels, congestion or hazards, noise levels and other environmental considerations;

- access, circulation and parking to the development shall be provided in accordance with the policies in the Transport and Communications chapter. The site should be capable of accommodating the required parking provision without detriment to the visual amenities of the area through over intensive parking in a prominent position;

- development should not result in the loss of significant buildings, public views or spaces between and around buildings, or trees or other landscape features which make an important contribution to the character of the area;

- the design of hard and soft landscaping in spaces around buildings should enhance and complement new development where appropriate.
and should maximise wildlife potential by the use of native species and appropriate design in accordance with Policies ST11 and ST12;

- development should consider the enclosure of spaces around buildings and should be designed to take account of overlooking, microclimate and the function of such spaces;

- development should seek to maximise the efficient use of energy, resources and materials through the influence of factors such as design, housing type, orientation, location and construction methods.”

3.15 Saved and NPPF Compliant Policy RES9 states that “affordable housing will be sought within proposals for housing development where there is a demonstrable current need in the locality. The amount sought will depend on the following:

- the level of need in the locality
- site size and suitability
- the location of the site in relation to services
- site development costs
- the need not to prejudice other planning objectives of the development scheme;
- the aim of achieving a successful housing development including factors such as housing mix and, where applicable, subsequent management of the scheme.

On sites not specifically allocated but within the planning boundary, the Council will seek provision as follows:
in Newhaven, Seaford and Peacehaven and Telscombe, within housing developments of 25 or more dwellings (or sites of 0.8ha or more).”

3.16 Policy RES9 will not apply to open market housing intended to meet special housing needs such as sheltered housing.

3.17 Saved and NPPF Compliant Policy H5 states that “planning permission and/or listed building consent will be granted for developments within or near to Conservation Areas, provided that they:

- conserve or enhance the special architectural or historic character or appearance of the area and re-instate historic elements wherever possible
- do not require the demolition or partial demolition of any unlisted building(s) which make a positive contribution to the character or appearance of the area
- use materials which are traditional to the area or are otherwise sympathetic to the character of the particular building or site
- respect the design of the existing buildings of the area
- respect any important traditional groupings of buildings which contribute to the character of the area
- protect open spaces, trees and significant public views, and
- comply with the criteria in Policy ST3

Where a building makes no positive contribution to the character or appearance of the Conservation Area, consent for demolition may be granted subject (a) to planning permission having been granted for redevelopment of the site and (b) to a condition that demolition will not take place until a contract has been entered into for the implementation of the planning permission.”
3.18 Saved and NPPF Compliant Policy H7 states that “Council will seek to minimise the traffic levels in Conservation Areas and applicants for planning permission may be required to provide traffic impact studies to help assessment. Where necessary the District Council, in conjunction with the Highway Authority, may require traffic management measures to be implemented to manage the impact on the Conservation Area of traffic associated with a development proposal.”

3.19 Saved and NPPF Compliant Policy T14 states that “Development proposals, including conversion and change of use, will be required to:

- **Limit parking provision, in accordance with Maximum Parking Standards, to meeting those access demands not capable of being satisfactorily met by other more sustainable means. In certain circumstances, there would be scope to reduce parking provision from the Maximum Standards. Factors such as the availability of local public transport, cycle and pedestrian accessibility, impact on vitality and viability of town centres, environmental impact and traffic conditions, and the availability of public parking elsewhere, will be taken into account in determining this. Provision must also take account of operational needs.**

- **Provide for those improvements to sustainable access which are necessary to complement permitted levels of parking provision. This will include appropriate financial contributions to improvements to public transport, pedestrian and cycle access and/or any other sustainable improvements to the transport network which are necessary and directly related to the proposed development, including the preparation of Travel Plans. Developers will be expected to contribute more to improving access by a choice of means of transport for developments in locations away from town centres and major transportation interchanges etc.**
• Ensure the most efficient use of permitted public parking space through the adoption of suitable management arrangements, where appropriate.

Emerging Local Planning Policy

Core Strategy

3.20 The Core Strategy will cover period up until 2030. It has gone through numerous local consultations and will be submitted for examination in 2014. The adoption is expected in early 2015.

3.21 The proposed policy CP2 paragraph 7.22 highlights that “Local Housing Needs Assessment has identified that the main growth in demand to 2030 will be for dwellings for older people and small homes for single person households and couples with no dependents. However, there will also be a need for family homes, particularly due to the level of under-occupation of larger family homes in the district, creating pressures of demand (and therefore on affordability) for homes of this type. Dwellings suitable for older people are likely to include a combination of smaller units to allow people to downsize in the area in which they want to live; flexible and adaptable ‘Lifetime Homes’; and specialist accommodation such as nursing homes and extra care homes.”
4.0 Pre-Application Discussions

4.1 A Pre-Application meeting was held at Lewes District Council on Thursday 21st August 2014 at 10am. Those in attendance were: Alex Bateman (Senior Planner, SHW), Daniel Phillips (Assistant Planner, SHW) and Rachel Richardson (Senior Planning Officer, Lewes District Council). The scheme being discussed is that of Blatchington House, Firle Road, Seaford and its potential redevelopment for housing (Use Class C3) (see Appendix C).

4.2 The meeting focussed around the following elements and will discussed in detail below.

Principle of redevelopment

4.3 At this stage, the redevelopment proposals are fluid, but it is considered that this will result in the redevelopment of the existing plot following the demolition of Blatchington House.

4.4 Several constraints affect the site and include:

- The site is located within a conservation area
- The site also backs onto an area of established character
- The site is in close proximity to protected tree order and tree belt, located to the west of the site.

4.5 However, taking all of this consideration, the Planning Officer confirmed that there are no Planning Policy reasons for the retention of the Care Home (C2) use and that a redevelopment for housing (C3) would be acceptable in principle.

Principle of low or high density scheme

4.6 The first scheme discussed was that of high density detached dwellings in a courtyard layout with a single access point. This scheme would provide 9 3-
bedroom dwellings within plot sizes comparable to that of Kingsmead Close to the rear of the site.

4.7 The Planning Officer considered that a scheme such as this would represent overdevelopment of the site and was too intensive in an area which has a mixed character. It was considered that a scheme should draw its layout and appearance from Firle Road as opposed to Kingsmead Close.

4.8 The second scheme discussed was that of lower density including 4 4/5-bedroom dwellings set within plot sizes comparable to most on Firle Road.

4.9 The Planning Officer considered this was an appropriate level of development and respected the character, spacing and layout of properties along Firle Road.

4.10 The third scheme discussed was of that for a sheltered housing development. It was stated that there would be no objection in principle but it would potentially be considered more intensive. There would also be issues in regards to the conservation area.

Design

4.11 As the low density scheme was preferred, discussions moved onto design. The Planning Officer, in assessing the layout, suggested that each dwelling should be designed differently to compliment the Conservation Area. It was also considered that they should be of high quality, again in keeping with the character of the area which are large, detached properties of individual design.

Access

4.12 With regards to accessing the development, this seemed appropriate for access to be provided off Firle Road. There was discussion of how access was to be made to the houses at the rear of the site but this was something which can be designed at a later stage.
4.13 It was recommended that the units should provide 3 car parking spaces per unit due to the nature of the developments being 4/5 bed properties.

Information to be submitted with the planning application

4.14 It was suggested that the following documents be submitted alongside the planning application to support the document.

- Planning Statement
- Design and Access Statement
- Full plans including floorplans, elevations, sections and streetscenes
- Tree Survey
- Heritage Statement
- Archaeological Survey

4.15 A copy of the Planning Officer’s letter is at Appendix D.
5.0 Material Planning Considerations

5.1 This section reviews the likelihood of obtaining alternative planning permissions in relation to the land and buildings within the relevant planning policy context and any other material considerations.

Alternative residential uses

5.2 The local and national policy is open to changes within residential uses subject to appropriate and sustainable location and local need.

5.3 The pre-application discussions have revealed that an in principle redevelopment for residential would be accepted. Two schemes were discussed in detail and it would appear that 4 large detached dwellings with large plots would be most appropriate.

Development in Conservation Area

5.4 As seen from the planning history there have been numerous consents for development on site and as such development is not apposed in the Conservation Area.

5.5 Furthermore, the existing building is considered to add little to the character of appearance of the local area. This is particularly evident when considering that flats are not found in this locality. It is therefore considered, that subject to design, redevelopment of the site would be accepted.

Design and Access

5.6 The proposal for higher and lower density residential development has been considered on site.

5.7 The higher density development would include 9 detached dwellings of 3-4 bedrooms set in a cu-de-sac setting accessed of Firle Road.

5.8 The lower density development would include 4 detached dwellings of 4-5 bedrooms set on separate plots with common access of Firle Road.
5.9 The pre-application meeting indicated an appetite to progress with a scheme for 4 detached dwellings. However, it was considered that each dwelling should differ in scale, appearance and design, which is a prevailing aspect of the locality.

Transport

5.10 Proposals are fluid, with no definitive layout or property size. However, considering the scheme for 4 detached dwellings, the Planning Officer requested 3 car parking spaces per unit. Furthermore, stated that further consideration would need to be given towards the access arrangements. That being said, it is not suggested that there are any access concerns.
6.0 Summary and Recommendations

6.1 The current comprises a Care Home (Use Class C2) with associated grounds. Consideration is being given to the redevelopment of the existing plot.

6.2 The Planning History indicates that development associated with the existing use is acceptable by the Local Planning Authority. But in order to inform redevelopment proposals an assessment of the relevant planning policy and a subsequent pre-application meeting with a Planning Officer was undertaken.

6.3 This provided clarity and confirms that a redevelopment would be acceptable in principle subject to an appropriate design. Considering the different proposals discussed at the meeting, it was confirmed that a low density scheme of 4 detached (4/5-bedrooms) would be appropriate.

6.4 As a result of that above, it is our recommendation that planning permission be sought for 4 dwellings in accordance with the pre-application discussions and conclusions.
## Appendix A – Assessment of consistency of ‘saved’ Lewes District Local Plan policies (2007) with the National Planning Policy Framework (2012)

<table>
<thead>
<tr>
<th>Policy Ref</th>
<th>Policy Subject Area</th>
<th>Consistency with NPPF</th>
</tr>
</thead>
<tbody>
<tr>
<td>ST1</td>
<td>Infrastructure Provision</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>ST2</td>
<td>General Infrastructure</td>
<td>Not consistent&lt;br&gt;Although on the face of it the policy seems to be in accordance with NPPF (particularly para 204), the NPPF adds further criteria (para 205) and seeks to avoid the use of planning obligations, instead preferring the use of conditions (para 203).</td>
</tr>
<tr>
<td>ST3</td>
<td>Design, Form and Setting of Development</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>ST4</td>
<td>Design, Form and Setting of Development</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>ST5</td>
<td>Access for People with Limited Mobility</td>
<td>Not consistent&lt;br&gt;Although not appearing to be in conflict with the NPPF, such an issue would be covered by other regulatory controls (i.e. building regulations). This negates the need for such a policy. Development Management should seek advice from Building Control when seeking advice on layouts affecting people with limited mobility.</td>
</tr>
<tr>
<td>ST6</td>
<td>Access for People with Limited Mobility</td>
<td>As Policy ST5</td>
</tr>
<tr>
<td>ST11</td>
<td>Landscaping of Development</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>ST14</td>
<td>Water Supply</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>ST20</td>
<td>Recycling and Re-use of Materials</td>
<td>Not considered appropriate to review at this stage. Await publication of the national waste planning policy&lt;br&gt;Para 5 explains that the NPPF does not cover waste – national waste planning policy will cover it instead. The Waste Planning Policy Statement remains in place and this policy may accord with it.</td>
</tr>
<tr>
<td>ST21</td>
<td>Recycling and Re-use of Materials</td>
<td>As Policy ST20</td>
</tr>
<tr>
<td>ST25</td>
<td>Pylons and Overhead Lines</td>
<td>Consistent, in part, with the NPPF, but no change from its status pre-NPPF&lt;br&gt;LDC has previously advised that the AONB designation no longer exists, thus the policy can only be applied for the Conservation Areas.</td>
</tr>
<tr>
<td>ST29</td>
<td>Advertisements</td>
<td>Consistent, in part, with the NPPF, but no change from its status pre-NPPF&lt;br&gt;LDC has previously advised that the AONB designation no longer exists, thus the policy can only be applied for the Conservation Areas.</td>
</tr>
<tr>
<td>ST30</td>
<td>Protection of Air and Land Quality</td>
<td>Fully consistent</td>
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</tbody>
</table>

Green (G) – Fully consistent – Apply policy alongside NPPF.<br>Ambrose (A) – Partly consistent – Apply by judging weight which can be applied to the policy, alongside NPPF, in the specific circumstances of each individual application.<br>Red (R) – Not consistent – Do not apply these policies any more.
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<th>Policy Ref</th>
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<th>Consistency with NPPF</th>
</tr>
</thead>
<tbody>
<tr>
<td>RES1 (R)</td>
<td>District Housing Land Strategy</td>
<td>Not consistent</td>
</tr>
<tr>
<td></td>
<td>Does not conform with paragraph 47 of the NPPF (boosting supply of housing). The policy does not provide the basis for establishing a five year housing land supply. Even without the NPPF, the target has been superseded by the South East Plan and hence the policy has no weight.</td>
<td></td>
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<tr>
<td>RES2 (G)</td>
<td>First Phase of Residential Development</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>RES3 (R)</td>
<td>Second Phase of Residential Development</td>
<td>Not consistent</td>
</tr>
<tr>
<td></td>
<td>The policy is not in conformity with paragraph 159, point 2 of the NPPF. This paragraph requires a SHLAA to be produced. It is the SHLAA that will be used to assess sites for housing. As such this policy is redundant.</td>
<td></td>
</tr>
<tr>
<td>RES6 (R)</td>
<td>New development in the Countryside</td>
<td>Not consistent</td>
</tr>
<tr>
<td></td>
<td>The policy is not in conformity with paragraph 55 (housing in the countryside) of the NPPF. This paragraph introduces other exceptions meaning that the policy RES6 is incorrect in stating that development would be refused if parts a) and b) were not met.</td>
<td></td>
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<tr>
<td>RES7 (R)</td>
<td>New development in the Countryside</td>
<td>Not consistent</td>
</tr>
<tr>
<td></td>
<td>The policy is not in conformity with paragraph 55 point 3 (rural housing) of the NPPF. The NPPF takes a more positive view to the conversion of rural buildings for residential purposes than the saved Local Plan policy. It would be argued that our Local Plan policy was overly restrictive when compared against the NPPF.</td>
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<tr>
<td>RES8 (G)</td>
<td>Replacement Dwellings in the Countryside</td>
<td>Fully consistent</td>
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<tr>
<td>RES9 (G)</td>
<td>Affordable Housing</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>RES10 (G)</td>
<td>Affordable Homes Exception Sites (i.e. Outside the Boundary)</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>RES13 (G)</td>
<td>All extensions</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>RES14 (G)</td>
<td>All extensions</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>RES18 (G)</td>
<td>Garages and other Buildings ancillary to Existing Dwellings</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>RES19 (G)</td>
<td>Provision of Outdoor Playing Space</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>RES20 (G)</td>
<td>Provision of Educational Facilities</td>
<td>Fully consistent</td>
</tr>
</tbody>
</table>

Green (G) – Fully consistent – Apply policy alongside NPPF.
Amber (A) – Partly consistent – Apply by judging weight which can be applied to the policy, alongside NPPF, in the specific circumstances of each individual application.
Red (R) – Not consistent – Do not apply these policies any more.
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</thead>
<tbody>
<tr>
<td>RES21 (A)</td>
<td>Provision for Gypsies</td>
<td>Consistent, in part, with the NPPF</td>
</tr>
<tr>
<td></td>
<td></td>
<td>National policy relating to Travellers is covered in the Planning Policy Statement for Traveller Sites.</td>
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<tr>
<td></td>
<td></td>
<td>The policy statement states that decisions should be made in accordance with the development plan (para 20) and that a criteria based policy should apply to such site provision (para 10). As such, weight can be attached to this policy.</td>
</tr>
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<td></td>
<td></td>
<td>However, due consideration should also be given to part H (paras 20-26) of the Policy Statement when determining applications as the section states how decisions should be made.</td>
</tr>
<tr>
<td>RES22 (A)</td>
<td>Travelling Show People</td>
<td>Consistent, in part, with the NPPF, see RES21</td>
</tr>
<tr>
<td>E1 (A)</td>
<td>Planning for Employment</td>
<td>Consistent, in part, with the NPPF</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Policy E1 is a criteria based policy with 9 sub parts. Parts a),b),c) and e) can continue to be used as they conform with different parts of the NPPF.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Part d) can no longer be used as it relates to Local Plan Policy E9 which does not conform with the NPPF.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Parts f)-i) do not accord with the NPPF. Para 51 of the NPPF supports the principle of conversion of commercial buildings to residential in areas of housing need. Thus no weight can be given to these policies.</td>
</tr>
<tr>
<td>E3 (G)</td>
<td>Town Centres</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>E4 (G)</td>
<td>Town Centres</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>E5 (G)</td>
<td>Town Centres</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>E6 (G)</td>
<td>New Retail Development on the Edge of Town Centres</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>E7 (G)</td>
<td>Out of Centre Retail Development</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>E8 (G)</td>
<td>Neighbourhood Shops/Public Houses</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>E9 (R)</td>
<td>Re-use of Rural Buildings</td>
<td>Not consistent</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Policy E9 repeats much of NPPF paras 28 and 55 and goes against the aims of para 51 which allows residential conversions. As a result no weight can be attached to this policy.</td>
</tr>
</tbody>
</table>

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<th>Policy Subject Area</th>
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</tr>
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<tbody>
<tr>
<td>E10</td>
<td>Tourism General Strategy</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>E11</td>
<td>Hotels, Guest Houses and other Serviced Accommodation</td>
<td>Fully consistent</td>
</tr>
</tbody>
</table>
| E12       | Hotels, Guest Houses and other Serviced Accommodation | Not consistent  
As with policy E9, E12 does not accord with NPPF para 51, as it allows for vacant commercial buildings to become permanent residential accommodation. |
| E13       | Hotels, Guest Houses and other Serviced Accommodation | Not consistent  
Paras 51 and 55 of the NPPF promote the reuse of buildings by allowing change of use. This policy does not conform with these paragraphs and thus cannot be used. |
| E14       | Bunk House Accommodation | Fully consistent |
| E15       | Existing Camping/ Touring Caravan Sites | Fully consistent |
| E17       | New Camping/Touring Caravan Sites | Fully consistent |
| E19       | Static Holiday Caravan Sites | Not consistent  
Not only is this policy negatively worded, against the NPPF’s aspiration to have positive policies (para 182), but it also goes against the need to support a prosperous rural economy, including sustainable rural tourism developments, as advocated by para 28. |
| CT1       | Planning Boundary and Key Countryside Policy | Consistent, in part, with the NPPF  
This is a criteria based policy with 11 sub-parts. It is very important in decision making as it establishes the planning boundary and underpins the protection of the countryside  
The NPPF seems to allow us to identify where development would be inappropriate (para 157) and advocates the protection of the countryside throughout (including in para 17). The drawing of the planning boundary is therefore acceptable as it defines the area considered ‘the countryside’, helping to provide a basis for its protection. Thus, most parts of the policy can remain in use. However, some of the sub parts of the policy no longer exist as its related policies have gone as they are no longer considered compliant. This includes parts b), f) and g). |
| CT5       | Institutional Sites | Consistent, in part, with the NPPF  
All parts of this policy remain in use, except part d) which has been replaced by paragraph 32, particularly point 3. |
| H2        | Listed Buildings | Fully consistent |

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<tbody>
<tr>
<td>H3</td>
<td>Buildings of Local, Visual or Historic Interest</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>H5</td>
<td>Development within or affecting Conservation Areas</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>H7</td>
<td>Traffic in Conservation Areas</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>H12</td>
<td>Areas of Established Character</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>H13</td>
<td>Parks and Gardens of Special Historic Interest</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>H14</td>
<td>Parks and Gardens of Local Historic Interest</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>RE1</td>
<td>Provision of Sport, Recreation and Play</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>RE2</td>
<td>Existing Recreational Open Space</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>RE3</td>
<td>Indoor Recreational Facilities</td>
<td>Not consistent</td>
</tr>
<tr>
<td>RE6</td>
<td>Lewes/Sheffield Park Railway Line</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>RE7</td>
<td>Recreation and the Rivers</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>RE8</td>
<td>Equestrian and Related Activities</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>RE9</td>
<td>Allotments</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>RE10</td>
<td>Community Infrastructure</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>T1</td>
<td>Travel Demand Management</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>T2</td>
<td>Buses</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>T3</td>
<td>Rail</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>T4</td>
<td>The Lewes/ Uckfield Railway</td>
<td>Fully consistent</td>
</tr>
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<tbody>
<tr>
<td>T7</td>
<td>Provision for Cyclist</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>T8</td>
<td>Pedestrian Routes and Traffic Calming</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>T9</td>
<td>Pedestrian Routes and Traffic Calming</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>T7</td>
<td>Provision for Cyclist</td>
<td>Could argue that there is 'robust evidence' as quoted in para 41.</td>
</tr>
<tr>
<td>T8</td>
<td>Pedestrian Routes and Traffic Calming</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>T9</td>
<td>Pedestrian Routes and Traffic Calming</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>T10</td>
<td>Pedestrian Routes and Traffic Calming</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>T13</td>
<td>Vehicle Parking</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>T14</td>
<td>Vehicle Parking</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>T16</td>
<td>Telecommunications</td>
<td>Not consistent</td>
</tr>
<tr>
<td>LW1, LW3-6</td>
<td>Allocations for Lewes House, Malling Brooks, Pinwell Road</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>LW7</td>
<td>The Eastgate Area</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>LW8</td>
<td>The Townscape</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>LW9</td>
<td>Lewes Battlefield</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>LW10</td>
<td>Access to the River Ouse</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>LW11</td>
<td>The Green Core</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>LW12</td>
<td>Bus Station</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>LW13</td>
<td>Cliffe High Street</td>
<td>Fully consistent</td>
</tr>
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<tbody>
<tr>
<td>LW14</td>
<td>Bear Yard</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>NH2, NH4,</td>
<td>Allocations for Downland Park, South of Valley Road, Land at the Marina, North East of Kings Avenue, West of Meaching Quarry, Newhaven Business Area</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>NH6-8, NH10</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NH12</td>
<td>Lorry Facilities/Park</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>NH13</td>
<td>Pedestrian Precinct</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>NH14</td>
<td>Castle Hill, The Promenade/West Beach</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>NH15</td>
<td>Castle Hill, The Promenade/West Beach</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>NH16</td>
<td>Castle Hill, The Promenade/West Beach</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>NH17-21</td>
<td>Allocations for Avis Road, Lewes Road, Primary School Site, Newhaven Harbour, Railway Quay</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>NH22</td>
<td>Rail Transport Links to the Port</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>NH23</td>
<td>East Quay</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>NH24</td>
<td>North Quay</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>PT1</td>
<td>The A259 South Coast Road</td>
<td>Not consistent</td>
</tr>
<tr>
<td>PT2</td>
<td>Land east and west of Peacehaven Sports Park</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>PT3</td>
<td>Intensification and Infilling</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>PT5-6</td>
<td>Allocations for Land at Keymer Avenue, Hoyle Road</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>PT7-PT9</td>
<td>Development along South Coast Road, Meridian Centre</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>PT10</td>
<td>Access and Permeability at the Meridian Centre</td>
<td>Fully consistent</td>
</tr>
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<tbody>
<tr>
<td>PT11 (G)</td>
<td>The Joff Youth Club</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>PT12-PT13 (G)</td>
<td>The Coast and Countryside</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>PT15 (G)</td>
<td>Telscombe Tye and Telscombe Village</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>PT16-PT18 (G)</td>
<td>Allocations at Lower Hoddern Farm, Land North of Bannings Vale, Cornwall Avenue</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>PT19 (G)</td>
<td>The Valley Area</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>PT20-PT21, PT23 (G)</td>
<td>Private Recreation Proposals, Valley Park, Arundel Road</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>SF1, SF5, SF8 (G)</td>
<td>Allocations at Land North of Cradle Hill, Gas Works, Cradle Hill Industrial Estate</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>SF9 (G)</td>
<td>Footpath to Church Lane</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>SF10 (G)</td>
<td>Richmond Road Car Park</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>SF11 (G)</td>
<td>Bishopstone Conservation Area</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>SF12 (G)</td>
<td>Land north of Alfriston Road</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>SF14 (G)</td>
<td>The Seafront</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>SF15 (G)</td>
<td>The Seafront</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>SF16 (G)</td>
<td>The Seafront</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>BA1 (G)</td>
<td>Barcombe – Recreational Facilities</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>BG1 (G)</td>
<td>Beddington &amp; Glynde – Industrial development at Balcombe Pit</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>CH1 (G)</td>
<td>Chailey – Chailey Brickworks</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>CH2 (G)</td>
<td>Chailey – New Heritage</td>
<td>Fully consistent</td>
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<tr>
<td>FL1 (G)</td>
<td>Falmer – University of Sussex</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>HY1 (G)</td>
<td>Hamsey &amp; St John Without – Hamsey Brickworks</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>NW1 (G)</td>
<td>Newick – Extension to the Playing Field</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>NW2 (G)</td>
<td>Newick – Woodgate Dairy</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>RG1 (G)</td>
<td>Ringmer – Caburn Field</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>RG3 (G)</td>
<td>Ringmer – Land adjacent to Ringmer Community College</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>RG4 (G)</td>
<td>Ringmer – Community/Recreation Area, The Broyle</td>
<td>Fully consistent</td>
</tr>
<tr>
<td>WV1 (G)</td>
<td>Wivelsfield – Land at Theobald Road</td>
<td>Fully consistent</td>
</tr>
</tbody>
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Dear Sirs

Blatchington House. Firle Road, Seaford, East Sussex BN25 2HH
Pre-Application Advice on Redevelopment for Housing (Use Class C3)

I write to request a pre-application meeting to discuss the redevelopment of Blatchington House. Firle Road, Seaford for housing (Use Class C3). Included with this letter is a Location Plan, two indicative layout plans and a cheque to the value of £540 inc VAT as requested by your authority.

Site Description

Blatchington House is a nursing home falling within Use Class C2. The home was originally a 16th century farmhouse and had nursing extensions built in 1986. It accommodates 34 residents in 30 single and 2 shared rooms. However, all but 3 have shared toilet facilities. Set within large grounds bordered with a flint wall.
The home is located on the west side of Firle Road, Seaford. Firle Road is a residential area, characterised by detached dwellings in generous grounds.

Access is gained from Firle Road, with the nearest bus stop is 200 metres to the southeast, providing easy access to Seaford Town Centre. Seaford mainline train station is 0.5 miles to the south (10 min walk), with access to the wider southeast including Lewes and Brighton. Connections are then available to London in under an hour.
The use of Blatchington House as a care home is no longer a viable option and therefore redevelopment of the existing site is being considered.

**Recent Planning History**

LW/11/0961 - Erection of two detached annexes (renewal of extant planning approval LW/08/0689 & LW/03/0816)  
Approved - 15 Dec 2011 **UNIMPLEMENTED**

LW/10/1171 - Erection of a detached house with dormer windows and rooflights at front and rear (material amendment to planning approval LW/05/1182) (Land Adjacent to Blatchington House)  
Approved - 26 Jan 2011

LW/08/0689 - Erection of two detached annexes (renewal of planning permission LW/03/0816)  
Approved - 12 Aug 2008 **UNIMPLEMENTED**

LW/06/1308 - Erection of two detached five bedroom houses with integral garage & two detached four bedroom chalet bungalows with detached garage (Land Adjacent to Blatchington House)  
Refused - 11 Jan 2007  
Appeal Dismissed

LW/05/1182 - Erection of two detached dwellings each with double garage off new drive (renewal of unimplemented planning permission LW/00/0925)  
Approved - 20 Jul 2005

LW/04/0542 - Erection of a three storey extension to rear  
Approved - 11 May 2004 **UNIMPLEMENTED**

LW/03/0816 - Erection of two detached annexes, one x two storey and one x single storey  
Approved - 09 Jun 2003 **UNIMPLEMENTED**

LW/00/0925 - Erection of two detached dwellings each with double garage off new private drive  
Approved - 13 Jul 2000

LW/00/0170 - Erection of three detached houses each with double garage off new private drive  
Refused - 27 Mar 2000

**Planning Policy**

In March 2012, the new National Planning Policy Framework was published. This set the tone for future Local Plan Policy and is a material consideration in the decision making process.

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Paragraph 7 outlines that there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to
perform a number of roles. With regards to social, this includes supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment.

Paragraph 9 states that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life, including (but not limited to):

- replacing poor design with better design
- improving the conditions in which people live, work, travel and take leisure; and
- widening the choice of high quality homes

Paragraph 17 sets out the 12 planning principles which underpin the national framework. These include, among others:

- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;
- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
- encourage the effective use of land by reusing land that has been previously developed (brownfield land);
- actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

Paragraph 49 states that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.

Paragraph 56 states that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Furthermore, paragraph 60 states that planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles.

Paragraph 131 states that in determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
• the desirability of new development making a positive contribution to local character and distinctiveness.

The Lewes District Local Plan was adopted in March 2003 and sets out the current planning strategy for the District. It is under review and will ultimately be replaced by the Local Development Framework.

On the 27th March 2012 (as mentioned above), the Government published the National Planning Policy Framework (NPPF). In light of this, Lewes District Council has undertaken a review of its 'saved' Local Plan policies to determine whether they are consistent with the NPPF. A report was considered and approved by the Lewes District Council Cabinet on the 17th April. This report is intended to provide clarity as to how the District Council will utilise the saved Local Plan policies in the determination of planning applications.

Saved and NPPF Compliant Policy ST3 states that “development requiring planning permission will be expected to comply with the following criteria, and be supported by justification statements where necessary:

• development should respect the overall scale, height, massing, alignment, site coverage, density, landscaping, character, rhythm and layout of neighbouring buildings and the local area more generally
• materials should be of a quality, type, colour and design which is appropriate to the character of the local area
• development, including conversion, should respect the amenities of adjoining properties in terms of noise, privacy, natural daylight, and visual amenities and smell
• development should not result in detriment to the character or the amenities of the area through increased traffic levels, congestion or hazards, noise levels and other environmental considerations
• access, circulation and parking to the development shall be provided in accordance with the policies in the Transport and Communications chapter. The site should be capable of accommodating the required parking provision without detriment to the visual amenities of the area through over intensive parking in a prominent position
• development should not result in the loss of significant buildings, public views or spaces between and around buildings, or trees or other landscape features which make an important contribution to the character of the area
• the design of hard and soft landscaping in spaces around buildings should enhance and complement new development where appropriate and should maximise wildlife potential by the use of native species and appropriate design in accordance with Policies ST11 and ST12
• development should consider the enclosure of spaces around buildings and should be designed to take account of overlooking, microclimate and the function of such spaces
• development should seek to maximise the efficient use of energy, resources and materials through the influence of factors such as design, housing type, orientation, location and construction methods."

Saved and NPPF Compliant Policy RES9 states that “affordable housing will be sought within proposals for housing development where there is a demonstrable current need in the locality. The amount sought will depend on the following:

• the level of need in the locality
• site size and suitability
• the location of the site in relation to services
• site development costs
• the need not to prejudice other planning objectives of the development scheme;
• the aim of achieving a successful housing development including factors such as housing mix and, where applicable, subsequent management of the scheme.

On sites not specifically allocated but within the planning boundary, the Council will seek provision as follows:

• in Newhaven, Seaford and Peacehaven and Telscombe, within housing developments of 25 or more dwellings (or sites of 0.8ha or more).”

Saved and NPPF Compliant Policy H5 states that “planning permission and/or listed building consent will be granted for developments within or near to Conservation Areas, provided that they:

• conserve or enhance the special architectural or historic character or appearance of the area and re-instate historic elements wherever possible
• do not require the demolition or partial demolition of any unlisted building(s) which make a positive contribution to the character or appearance of the area
• use materials which are traditional to the area or are otherwise sympathetic to the character of the particular building or site
• respect the design of the existing buildings of the area
• respect any important traditional groupings of buildings which contribute to the character of the area
• protect open spaces, trees and significant public views, and
• comply with the criteria in Policy ST3

Where a building makes no positive contribution to the character or appearance of the Conservation Area, consent for demolition may be granted subject (a) to planning permission having been granted for redevelopment of the site and (b) to a condition that demolition will not take place until a contract has been entered into for the implementation of the planning permission.”

The Proposal

At this stage, the redevelopment proposals are fluid, but it is considered that this will result in the redevelopment of the existing plot following the demolition of Blatchington House. That being said, two schemes are being tabled. The first, is a low density scheme of 4 dwellings within large plots. Each of the properties would be 4/5 bedroomed detached houses, which complements the existing character of Firle Road.

The second scheme is for higher density scheme of 9 dwellings set within plots of similar size to that of Kingsmead Close to the rear. Each of the properties would be 3/4 bedroomed detached houses within appropriately sized plots set within a cul-de-sac layout.

The intention of the pre-application meeting is to discuss the following elements:

• Principle of redevelopment
• Principle of low or high density scheme
• Design
• Access
• Information to be submitted with the planning application
• Any other considerations

I look forward to hearing from you with regards to a date/time to meet.

Yours Sincerely

Alex Bateman
Senior Planner
for and on behalf of
Stiles Harold Williams Partnership LLP
Dear Alex

Apologies for the delay in responding following our meeting held on 21st August.

I hope these comments will still be useful.

As you are aware, Blatchington House lies within a Conservation Area and is also an archaeological notification area, which would require you to carry out an assessment of the site for archaeological findings. The point of contact is Greg Chuter at East Sussex County Council (Gregory.chuter@eastsussex.gov.uk). As commented at the meeting it would also be advisable to refer to the Conservation Area Character Appraisal. Also, for the purposes of policy the site in question is within proximity to an Area of Established Character, which is recognised for its spacious verdant character and setting, and often wide tree lined roads.

There are also a number of protected trees within the site boundary and a TPO belt of trees running along the northern perimeter of the site. Any application would need to be accompanied by an arboricultural survey.

Any development proposal in an area with these constraints will need to be designed sympathetically to meet these policy requirements. However, as discussed the principle of loss of a nursing home is acceptable subject to any new development proposal satisfying the relevant development plan policies and National Planning Policy Framework. Neither scheme would trigger the need for affordable housing provision.

To summarise what was said at that meeting I will comment on each layout in turn.

Layout 1 – four detached houses

This was the preferred scheme of layout 1 and 2. The proposal which includes a variation in plot sizes, shapes and footprints would maintain the individual housing designs and spacious setting of the existing area.

The number of dwellings proposed in this layout would not trigger the need for a Section 106 Agreement and financial contributions for the provision of recreation, kerbside recycling, education and improvement to highways will not be required.

This layout has not included the provision of access but the obvious point of access would be via the existing road running along the northern perimeter of the development site boundary. This is adjacent to the protected belt of trees so any proposal would have to be respectful of this.

Although the proposed houses also appear to have a satisfactory level of separation between them, any scheme should be mindful of overshadowing/loss of daylight and sunlight, and overlooking/loss of privacy.

Layout 2 – nine detached houses in a cul-de-sac arrangement

This Layout would be likely to be recommended for a refusal of planning permission because it would be considered to be an overdevelopment and out of character with the pattern and grain of existing development in the locality.

With regards to the Core Strategy the Planning Policy team carried out a further public representations period on a set of Focused Amendments to the Proposed Submission Joint Core Strategy (Local Plan Part 1) between May and
July 2014. The LPA are now going through the representations received and the core strategy has been submitted to the Secretary of State for examination.

Work is also well underway on the proposed submission version of the Site Allocations and Development Management Policies DPD (Local Plan Part 2). It is expected that this will be published for representations in spring 2015.

The latest 5 year housing land supply position it is explained here: http://www.lewes.gov.uk/Files/plan_Housing_Land_Supply_Note_as_at_1_April_2014_PDF.pdf

Please accept the above advice without prejudice to any subsequent decision made by the Council. If you have any further queries please do not hesitate to contact me.

Kind regards

Rachel Richardson
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Lewes District Council working in partnership with the South Downs National Parks Authority

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