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# Planning Statement

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## Land at Harbour Heights

Prepared for:

Trafalgar Group Ltd

Prepared by:

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# 1. Introduction and Summary

- 1.1. This Planning Statement has been prepared by Savills on behalf of Trafalgar Group Ltd (The Applicant) and is submitted in support of an outline planning application with all matters reserved except for access for the development of Land at Harbour Heights (hereafter referred to as “the Site”).
- 1.2. The site falls within the administrative area of Lewes District Council (LDC). The proposal is described as follows:
- “Outline application with all matters reserved (except for means of access) for the development of circa 400 dwellings and approximately 1,500 sqm of commercial floorspace with associated community provision, amenity land, vehicle and cycle parking provision and associated infrastructure at Harbour Heights, Newhaven”.*
- 1.3. The purpose of this Planning Statement is to explain the proposal and how it accords with relevant planning policy. This Statement sets out the planning context for the proposed development, including:
- A description of the site (Section 2);
  - Details of the previous planning applications at the site and public engagement history (Section 3)
  - Outlines of the proposals (Section 4)
  - An overview of the relevant planning policies and guidance (Section 5);
  - A policy assessment (Section 6);
  - Concluding the Planning Statement (Section 7).

## Background to the Proposals

- 1.4. This proposal seeks to develop an underutilised part brownfield site within the Town of Newhaven by bringing forward the 20 Ha site allocation designated under the Lewes Core Strategy (2016) Spatial Policy 7 (Land at Harbour Heights) for a mixed-use development, which will include high quality employment development and approximately 400 dwellings. The proposals submitted are much more than simply the provision of new houses. The vision of the applicant is to create an environmentally responsible distinctive development, within an attractively landscaped coastal setting. This will be through the provision of substantial open spaces and interlinking cycle and walking routes that provide opportunities for more informal social interaction, promoting health and wellbeing.
- 1.5. This is an outline application at this stage, however the subsequent reserved matters applications to follow will include a mix of dwelling types, sizes and tenures, targeted at meeting local needs whilst assisting in creating a balanced and mixed community for Newhaven. Notwithstanding this, as seen in the parameter plans (land use, access and movement, density and building heights plans) and the indicative layouts submitted, the proposals have been designed to consider all matters to create a comprehensive and robust masterplan for the site.
- 1.6. As part of this outline scheme, the proposal seeks to obtain detailed planning consent for the provision of an upgraded primary vehicular access into the site from Quarry Road in addition to a restricted secondary access from Court Farm Road.

- 1.7. This submission is the result of an iterative design process, and the proposals have evolved considerably through a series of pre-application meetings with LDC, Newhaven Town Council and relevant stakeholders. The details of these meetings are set out in Section 3 within this Statement and the accompanying Statement of Community Involvement (SCI).

#### Environmental Impact Assessment (EIA)

- 1.8. An EIA screening request was submitted to LDC in August 2021. A formal EIA Scoping Opinion (ref: PREAPP/21/0119) was obtained from the LPA on the 18<sup>th</sup> November 2021 confirming the following:

*“Having regard to the selection criteria in Schedule 3 of the Regulations, and following an assessment carried out against The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 Screening Matrix, it is considered that the proposed development is unlikely to have significant environmental effects. As such an Environmental Impact Assessment is not required”.*

- 1.9. An EIA is therefore not required to be submitted to accompany this application.

#### Supporting Information

- 1.10. This Planning Statement should be read in conjunction with the following submitted plans and reports:

Document	Prepared by	Reference
Design and Access Statement	Savills Urban Design	475310 Rev 3
Illustrative Masterplan	Savills Urban Design	475310/IMP Rev D Apr23
Movement Street Hierarchy Parameter Plan	Savills Urban Design	475310_SH_Rev_C
Building Heights Parameter Plan	Savills Urban Design	475310_BH_Rev_C
Land Use Budget Plan	Savills Urban Design	475310_LUB_Rev_B
Land Use Plan	Savills Urban Design	475310_LUP_Rev_A
Red Line Boundary Plan	Savills Urban Design	475310_AP_Rev_A
Landscape and Visual Assessment	Davies Landscape Architects	DLA/2041/LVIA/RPT/03/V4 June 2023
Wired Frames	Davies Landscape Architects	DLA/2041/PW/RPT/02/V2 May 2023
Ecological Impact Assessment	Lizard Landscape and Ecology	LLD2603-ECO-REP-007-00-EcIA
Biodiversity Net Gain Assessment	Lizard Landscape and Ecology	June 2023
Transport Assessment including Travel Plan	Mayer Brown	June 2023
Flood Risk Assessment and Drainage Strategy	Herrington Consulting Ltd	3410 May 2023
Desk Based Heritage and Archaeology Assessment	Archaeology South-East	2022099 July 2022
Geophysical Survey	Archaeology South-East	07369 July 2022
Air Quality Assessment	Savills Infrastructure	Rev 03 Sep 22
Energy Statement	NuPlanet	24.05.23 Rev B
BREEAM Assessment	NuPlanet	24.05.23 Rev B
Noise Assessment	Anderson Acoustics	5655_001R_2-0_DM

Soil Management Plan	Land Research Associates	Report 2057/1 3rd October, 2022
Ball Strike Assessment	Labosport	LSUK.22-0295 Rev 1
Coastal Study	Herrington Consulting Ltd	April 2023 Rev 2
Statement of Community Involvement	BECG	Jan 2023

## 2. Site and Surroundings

### The Site Context

- 2.1. The site is approximately 20 Ha and consists of the former Meeching Quarry (now Quarry Road Industrial Estate) in addition to open arable land. The existing industrial estate is located on the eastern part of the site and contains a number of outdated commercial buildings as well as areas of hardstanding, consisting of Trafalgar House a three storey office building, a collection of warehouse type buildings as well as smaller workshop buildings. The wider arable land is located on the western section of the site and comprises grazing land with some dense areas of scrub along its perimeters.

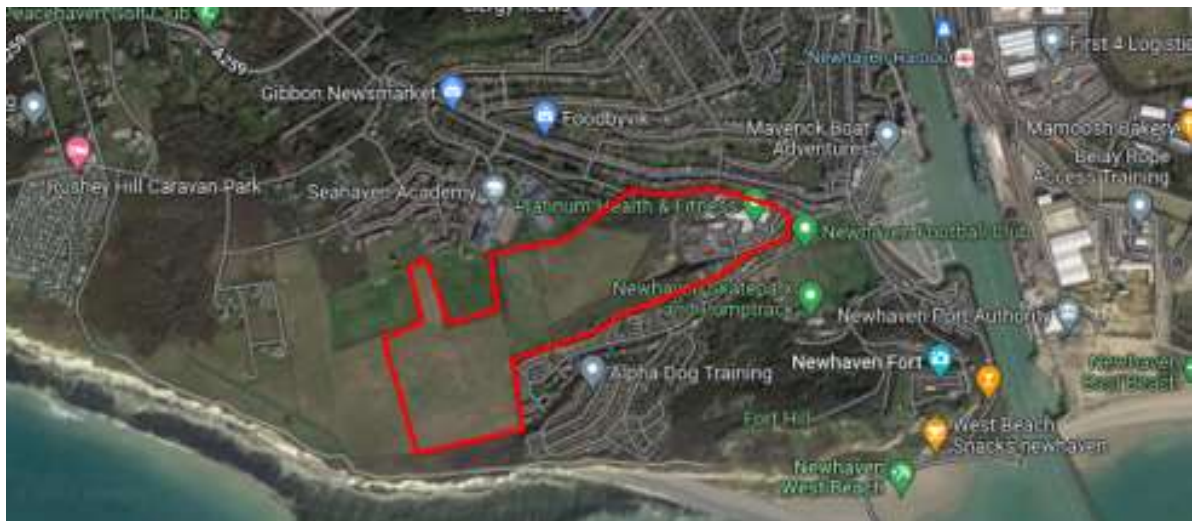


Figure 1 Site Location (Google Maps, 2022)

- 2.2. The site lies on the cliff-top promontory to the west of the Ouse estuary south of Newhaven Town and extends downslope to incorporate low-lying land west of the marina and north-west of Castle Hill which flanks the Harbour mouth. The topography of the site is varied with the eastern industrial section of the site being fairly level. To the immediate west of this however lies steep chalk cliff face of the former quarry, which rises steeply into the upper western section of the site, which consists of rolling hills made up of largely grassland.



Figure 2 Existing industrial site facing west



Figure 3 Existing site facing west

- 2.3. Primary vehicular access is currently provided for the site to the east off Quarry Road (via Court Farm Road). The site does not contain any Public Rights of Way however the site sits alongside two coastal

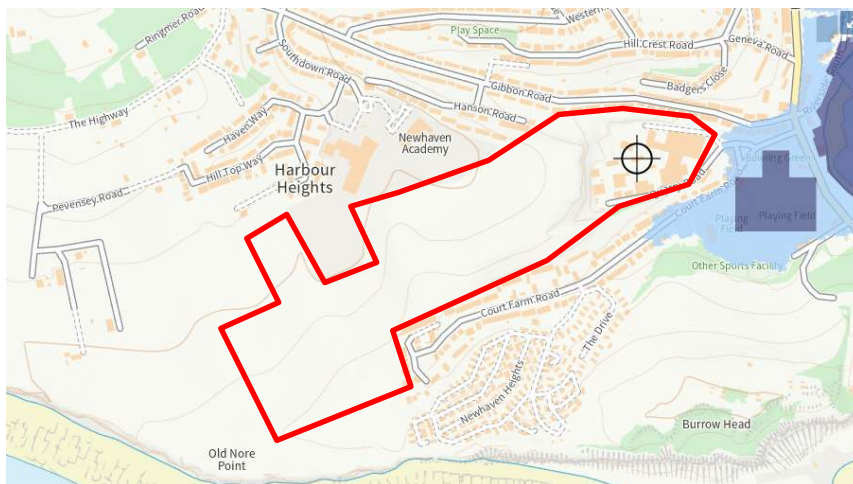
paths to the south (footpath 14a and 13c). The site also has a secondary access off Court Farm Road to the south.

### Surrounding Context

- 2.4. The site is bordered to the north by the Seahaven and High Cliff Academy buildings and associated playing pitches alongside other residential development located along Gibbon Road. To the south, lies residential development along Court Farm Road. Open fields border the site to the west.
- 2.5. The site abuts Newhaven built development and sits within the defined settlement boundary. In terms of public facilities, the site has good access to local facilities including a local supermarket, schools (Seahaven and High Cliff Academy's), local pubs (The Hope Inn) and other shops and eating establishments.
- 2.6. The site is also located approximately 800m to the south of the Newhaven Town Centre. A bus stop is located nearby on Gibbon Road located approximately 50 metres to the north along Gibbon Road, which has regular services to Brighton and other towns within the East Sussex area. There is also a bus stop to the south (Downland Park) with services to South Heighton. The site is also located around 1km to both Newhaven Town and Newhaven Harbour Train Stations, which provide regular services to Brighton, and beyond.

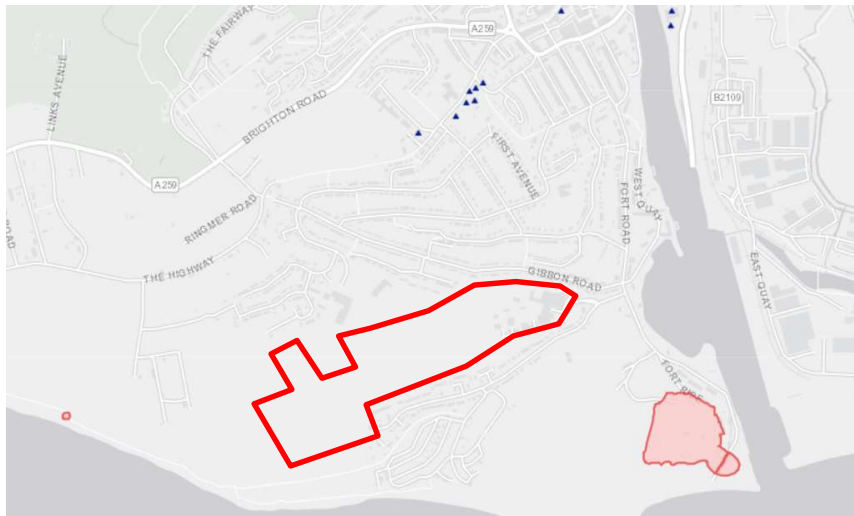
### Environmental Considerations

- 2.7. According to Environmental Agency (EA) flooding maps within Figure 4 below, the site is located within Flood Zone 1 (low risk of flooding).



*Figure 2 Environmental Agency Flooding Map*

- 2.8. In terms of heritage, there are no Listed Buildings located within the site and it does not fall within a Conservation Area. There is the military fort and lunette battery Scheduled Monument (SM) located approximately 500m to the south east of the site beyond Court Farm Road and the Castel Hill Local Nature Reserve. This is also a small collection of listed buildings located 500 metres to the north of the site including the Grade II\* listed Church of St Michael and All Angels in addition to the Grade II listed associated Rectory. The site is partly located within an Archaeological Notification Area.



*Figure 3 Heritage England Listed Building Search*

- 2.9. With regards to ecology, the site is not policy designated in ecology terms however a Site of Special Scientific Interest (SSSI) Brighton to Newhaven Cliffs is designated to the south of the site approximately 70m away and there is also Local Wildlife Sites and Local Nature Reserves located around the site but not directly connected. The South Downs National Park (SDNP) boundary lies around 1km to the north of the A259.



### 3. Planning and Engagement History

- 3.1. The site has been historically used for agriculture and industrial purposes. Following the site's allocation within the Lewes Core Strategy (2016), a Hybrid planning application was submitted in 2019 for the site for the following development:

*"Full planning permission is sought at Phase 1 for the demolition of existing buildings and erection of 955m<sup>2</sup> of B1 office space, 376m<sup>2</sup> of flexible B1/B8 floorspace, 90m<sup>2</sup> of A1 retail space and 124m<sup>2</sup> of A3 café space and the erection of 265 new build apartments and associated works.*

*Outline planning permission is sought at Phases 2, 3 and 4 for the erection of 431 new dwellings (239 houses / 192 apartments), provision of a café, pharmacy and public park and associated works. The reserved matters are appearance, landscaping and layout".*



Figure 4 Proposed Masterplan Layout

- 3.2. The determination of the planning application LW/19/0378 came to a pause in late 2019 on the basis of LDC requiring outstanding technical information to overcome significant consultee objections that had arisen during the course of the determination due to the proposals significantly exceeding the extents of the location in the adopted development plan.

#### Nearby Development – Newhaven Marina

- 3.3. **LW/19/0926 | Demolition of existing structures and a phased development consisting of the erection of 259 residential apartments (Use Class C3) & 141 retirement living apartments (Use Class C2) with car parking; up to 3,500m<sup>2</sup> commercial floorspace (including restaurant (Use Class A3), marina related retail (Use Class A1), marina related workshop (Use class B2), marina facilities (including offices, clubroom changing rooms etc.), office floorspace (Use Class B1), 50 bed apart hotel (Use Class C1); ancillary gym) and boat/car park; berths & riverside walkway.**



Figure 7 Newhaven Marina Layout Plan

- 3.4. The above planning application was submitted in December 2019 and obtained a recommendation for approval at the Planning Applications Committee on the 9<sup>th</sup> November 2022. Overall, LDC planning officers considered the proposal to offer considerable public benefits in light of the 5 year housing supply deficit.

### Pre-application Engagement

- 3.5. A Planning Performance Agreement (PPA) was signed in May 2023 between LDC and the applicant and an extensive number of pre-application meetings have taken place since 2021. These comprise a series of virtual meetings with relevant LPA consultees on the following dates and matters:

- 1<sup>st</sup> July 2022 (principle of development)
- 24<sup>th</sup> August 2022 (landscape, ecology and regeneration matters)
- 1<sup>st</sup> September 2022 (Housing mix and legal matters)
- 7<sup>th</sup> September 2022 (coastal erosion, drainage, air quality and contamination)

- 3.6. The pre-application proposals (please see Figure 8) submitted to the LPA showed a development of circa 400 homes, with access achieved through the provision of a new vehicular access from Court Farm Road:



Figure 8 Pre-Application scheme

- 3.7. The formal written pre-application feedback from LDC was received on the 28<sup>th</sup> February 2022 (ref: PREAPP/21/0119). The feedback received stated that the principle of developing was established and the following was also highlighted:

*“The Council is currently unable to demonstrate a five year supply of deliverable housing sites sufficient to meet the need for 782 dwellings per annum, as required by the Government. Decisions on planning applications involving the provision of housing will therefore apply a ‘tilted balance’ in favour of sustainable development, in accordance with Paragraph 11 of the NPPF”.*

- 3.8. Table 1 below sets out a summary of the LPA pre-application feedback, which has been taken into consideration.

Technical Matter	Summary of Key points
<b>Impact upon Character of Surrounding Environment</b>	<ul style="list-style-type: none"> <li>• It is considered the general character of the development as shown on the submitted design prospectus is consistent with policy DN25 (8) of LLP2.</li> <li>• The proximity to the edge of the South Downs National Park is noted and the development should be designed so as to minimise impact on views towards or from the National Park.</li> </ul>
<b>Highways and Parking</b>	<ul style="list-style-type: none"> <li>• It would be expected that each dwelling is provided with a minimum of 1 car parking space which is furnished with an operational electric vehicle car charging point.</li> <li>• The development should make provisions to allow for the coastal footpath route to pass safely through it in the event that cliff erosion renders the existing route unusable. The illustration provided for Sunset Heights includes ‘cliff top fencing’ that appears excessively high, considering the exposed nature of the cliff top and its vulnerability to winds.</li> </ul>
<b>Drainage and coastal management</b>	<ul style="list-style-type: none"> <li>• The proposals should be supported by a detailed geomorphological study combined with coastal process study supporting the proposal in context of historic and future erosion rates along this stretch of coast.</li> <li>• The use of infiltration drainage is discouraged, if infiltration drainage is to be used then it would need to be supported by the results of infiltration testing undertaken in accordance with BRE365 (repeated three times)</li> <li>• Water efficiency measures and rainwater harvesting equipment should be incorporated. Hard landscaping should include permeable surfaces wherever feasible in order to assist with site drainage.</li> </ul>
<b>Landscaping and Biodiversity</b>	<ul style="list-style-type: none"> <li>• It is essential that a full Ecological Impact Assessment (EcIA) is provided in line with BS42020 and CIEEM best practice.</li> <li>• The planning application should demonstrate that the scheme would provide a minimum 10% biodiversity net gain in accordance with the Lewes District Council Technical Advice Note (TAN)</li> <li>• The overall landscaping for the developer part of the site should not be overly domestic and, as with the wider site landscaping, should be focussed on native planting and boundary treatment that is sympathetic to the surrounding rural environment.</li> </ul>
<b>Sustainability</b>	<ul style="list-style-type: none"> <li>• It is important that building design and materials take solar gain, vulnerability to high wind speeds and intense rain driven by high winds, particularly in the Sunset Heights area, into account.</li> <li>• It is expected buildings that are likely to be affected by cliff erosion can be easily removed and these buildings should be designed so that they can either be reused or recycled.</li> <li>• A Green Travel Plan, incorporating measures to encourage future residents to use sustainable modes of transport, should be provided.</li> </ul>

<b>Heritage</b>	<ul style="list-style-type: none"> <li>• The County Archaeologist has recommended a desk-based heritage impact assessment is carried out in order to clarify the archaeological significance of the site and that the findings of the assessment inform a programme of archaeological evaluation across all accessible areas of the site.</li> </ul>
<b>Employment and Recreational Provision</b>	<ul style="list-style-type: none"> <li>• If there is to be any loss of employment floorspace, it must be demonstrated that existing space provided is no longer fit-for-purpose and ideally outlining a net gain in the amount of employment provided on site in terms of jobs provided.</li> <li>• Any employment space provided by the development should be set out in use class E (2020).</li> <li>• A risk assessment should be provided with the application to demonstrate how potential for ball strike would be avoided or mitigated.</li> <li>• The site would have the capacity to provide a certain level of outdoor facilities but that this needs to be balanced against the need for biodiversity net gain and habitat creation in green areas.</li> </ul>

*Table 1 Summary of the LPA Pre-Application Feedback*

## **Public Engagement**

- 3.9. NPPF Paragraph 39 explains that early and good quality pre-application engagement can enable better coordination between public and private resources and improve the outcomes for the community. The applicant sought to interact with local communities early within the planning process. As part of this, ongoing liaison with a wide range of stakeholders has taken place including:
- 2 x virtual meetings with the Newhaven Town Council
  - Creation of a consultation website <https://newhaven.consultationonline.co.uk/> to inform local stakeholders of the proposals and asking for their feedback. The consultation was advertised via social media and hard copy leaflets. Feedback was sought by telephone, email, online feedback form, online survey or freepost. Comments were accepted between 12<sup>th</sup> December 2022 and the 25<sup>th</sup> January 2023.
  - An in-person public exhibition on the 25<sup>th</sup> January 2023 supplementing the virtual consultation providing an opportunity for people to attend if they wished to discuss the proposals in person.
  - Preparation of a leaflet explaining the proposal and directing residents and other relevant stakeholders to a website.
- 3.10. All comments received during the pre-application process have been reviewed by the project team. Full details of the stakeholder and community engagement are detailed in the Statement of Community Involvement.



## 4. The Proposals

- 4.1. The application seeks outline planning permission with all matters reserved except for access. The proposals can therefore be described as follows:

*“Outline application with all matters reserved (except for means of access) for the development of circa 400 dwellings and approximately 1,500 sqm of commercial floorspace with associated community provision, amenity land, vehicle and cycle parking provision and associated infrastructure at Harbour Heights, Newhaven”.*

- 4.2. The Masterplan vision and layout has been designed on the basis of providing a strong relationship between streets, buildings and green infrastructure combined to provide a well defined and distinctive character throughout the development. The layout has been designed to incorporate the existing field pattern and topography contained within the site, and retains the majority of the existing trees and vegetation.

### **Layout and Character**

- 4.3. The overall masterplan strategy for the site seeks to create three distinct character areas within the site consisting of the following:

- The Port Quarter
- Mariners Village including Shell Park; and
- Sunset Heights

### The Port Quarter



Figure 9 Indicative visual of the Port Quarter

- 4.4. The Port Quarter area will form the eastern entrance of the site providing an important focal point and gateway into the proposed development. Given the Port Quarter's location adjacent to other built development and its proximity to the Newhaven Town Centre, its integrated position and lower ground

levels allows for higher density development. This will be characterised by flatted units that are more contemporary in appearance arranged around the primary street and series of piazzas servicing other ground floor E use class facilities such as cafés, shops and offices that will be designed with a degree of flexibility for future occupiers. These commercial facilities will provide a central focal element to the development, connecting both the commercial and residential spaces, and enabling additional local and accessible services to be provided for the existing community and future occupants of the site.

#### Mariners Village and Shell Park

- 4.5. The most central character area is the proposed Mariners Village situated on the highest and more exposed part of the site. The Mariners Village therefore takes its design cue from traditional coastal settlements by utilising a tightly knit urban form to create a series of enclosed cosy streets and amenity spaces.
- 4.6. The proposed residential units will be a series of terraces in which the roofscape will be defined by pitched roofs which will cluster together to frame this side of the harbour giving this part of Newhaven a more traditional and upmarket character.
- 4.7. The steep topography of this part of the site will be utilised to create a distinctive new public park (Shell Park), which could encompass a range of features such as amphitheatre type spaces, elevated board walks and a sun soaked south facing slope for relaxing and spending time in.

#### Sunset Heights

- 4.8. The westerly character area will be formed of Sunset Heights containing the outer flank of the site characterised by rolling clifftop fields, which afford great sea views to the south and west. To optimise these spectacular views, the proposed development layout will array an outer edge of three storey detached villas, which will overlook the clifftop park and look out towards the sea whilst being set back from the cliff edge to maintain the feel of openness at this location.
- 4.9. The proposed residential units will be a mix of detached and semi detached units with larger private amenity garden areas.

#### **Indicative Land Use Mix and Densities**

- 4.10. The development will accommodate a mixture of dwelling types and sizes. The specific housing mix is not fixed at this stage due to the nature of the application. The final mix will respond to design and market considerations at any subsequent Reserved Matters stage. An indicative development mix has however been provided below:

Character Area	Land Use	Unit Type	Quantity	Storey Heights
Port Quarter	Use Class C3	Residential	82 units	Up to 5 storeys
	Retained B2	Commercial	500 sqm	
	Use Class E office		400 sqm	
	Use Class E retail		577 sqm	
Mariners Village	Use Class C3	Residential	104 units	Up to 3 storeys

Sunset Heights	Use Class C3	Residential	214 units	Up to 3 storeys
<b>Total</b>			<b>400 residential units and 1,477 sqm of commercial floorspace</b>	

*Table 2 Indicative Housing Mix*

- 4.11. The proposed heights will range depending on their location within the site. Most dwellings will be between 2 and 3 storeys but within the Port Quarter there will be opportunities for flatted apartment buildings up to 5 storeys with commercial units located within the lower floors of the built development blocks. Standalone dwellings will not regularly exceed 2 storeys so that the character of the town edge and distant views from the SDNP are not significantly impacted.
- 4.12. In terms of proposed net density, the proposal will comprise as follows:
- The Port Quarter: 100 DPH
  - Mariners Village: 29 DPH
  - Sunset Heights: 18 DPH
- 4.13. The proposed densities are reflective of the surrounding context in Newhaven. Throughout the proposal the densities will vary in order to reflect the character areas and surrounding landscape, which define the sense of place. Higher densities can be found within the eastern section of site with lower densities proposed in the western sections of the site given the open fields to the west and coastal cliffs.
- 4.14. An assessment on whether affordable housing is required within the proposed housing mix for the site will be completed following a viability review as part of the determination of the application.

## **Landscape and Open Space**

### Landscape Strategy

- 4.15. A network of green infrastructure is proposed as part of the development. The uses of these areas will be multifunctioning and provide important amenity, ecological and landscaping functions. Existing boundaries will retain hedgerows and mature trees as well as incorporating new planting. Whilst a multi-functional approach will be taken to the open spaces throughout the site, the character areas and spaces will be designed and managed according to specific priority use.
- 4.16. The Port Quarter being positioned nearer to the centre of Newhaven will be a multi-functional area, used by residents and workers. Given the busy nature of the space, it will include a high proportion of robust, high quality green and hard landscaping, with the character of the area further defined by the adjacent buildings, street trees and contemporary street furniture and lighting.
- 4.17. With the exception of the Port Quarter, the rest of the site's topography to the west is more elevated. The landscaping strategy will therefore be more open delivering larger green spaces including an area of public open space (Shell Park) in the centre of the site. The creation of green links and linear walkways through this natural setting, will form a connection with nature that will be enjoyed by future residents and neighbours for years to come.

- 4.18. For Sunset Heights, the proposed landscaping strategy is to maintain the rolling clifftop field nature of the existing site whilst delivering high quality family homes that are detached with gardens to allow views of the sea through the development.

#### Public Open Space Provision

- 4.19. Throughout the site, the proposal will allow for a range of recreational areas and opportunities including formal and informal recreation through the incorporation of natural play space, informal meadow play, amenity grassland and social spaces.
- 4.20. The proposal will contain 2 Neighbourhood Equipped Areas of Play (NEAP), 2 Locally Equipped Areas for Play (LEAP) and 4 Local Areas for Play (LAP) which will be delivered in accordance with the LDC open space standards.

#### **Highways and Parking**

- 4.21. Four types of roads/streets are proposed within the development and each hold a slightly different character to define their hierarchy and create a recognisable street character. The road types are as follows:
- A Main Access Road to provide the main spine road for the site;
  - Secondary Streets which radiate out providing residential access to all parcels;
  - Mews Streets in denser parts of the development area;
  - Green Lanes will provide access to housing areas in more sensitive settings.
- 4.22. The proposal will deliver an upgraded primary vehicular access point into the site from Quarry Road in addition to a restricted secondary access point from Court Farm Road (to allow bus entry, refuse and emergency vehicle access as well as pedestrian and cycle access). In line with policy requirements, the proposed spine road will be designed to deliver a new bus route through the site.
- 4.23. Parking will be in accordance with the adopted parking standards. Details of the parking strategy will be considered within as part of the reserved matters application(s). As outlined in the Design & Access Statement, the illustrative masterplan has been informed by a likely level of parking provision. Wherever possible, electric vehicle charging points will be provided with each dwelling (houses).

#### **Drainage**

- 4.24. The proposals seek to deliver a sustainable drainage system through the use of both green and blue flowpaths including landscaped retention areas to reduce the volume of surface water flowing across the site during extreme weather events. The proposals have also been designed so that no buildings are located within the surface water flow paths.
- 4.25. The proposals have also been designed to connect to the existing foul sewer to discharge foul effluent from the site.



## 5. Planning Policy

### Introduction

- 5.1. This section provides a summary of the relevant planning policy as set out by the National Planning Policy Framework (NPPF), the Development Plan and any other relevant guidance and evidence base documents.

### The National Planning Policy Framework (NPPF)

- 5.2. The NPPF is the overarching national planning document which guides development in the country and to which Local Development Plan and decisions have to accord. The latest iteration of the NPPF was published in July 2021. It sets out the national policy which guides Local Planning Authorities LPA's on plan making and decision taking.

- 5.3. Paragraph 8 the NPPF identifies three overarching objectives to sustainable development; economic, social and environmental which are interdependent and need to be pursued in mutually supportive ways. These objectives are:

- **an economic objective** – *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- **a social objective** – *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- **an environmental objective** – *to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

- 5.4. The NPPF includes a presumption in favour of sustainable development which should be seen as the golden thread running through both plan-making and decision-taking. Paragraph 11 states that, for decision making, this means:

*“Approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

*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*

*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”.*

- 5.5. In order to achieve sustainable development, the NPPF sets out several aims which provide the context for assessment of development proposals. The different aims – so far as they are relevant to the assessment of this application – are set out in Section 6 of this planning statement.

### **The Development Plan**

- 5.6. A key role of the planning system is to regulate the development and use of land in the public interest. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that in making any determination under the Planning Acts the determination should be made in accordance with the Development Plan unless material considerations indicate otherwise. In this case the Development Plan (excluding minerals and waste) for the area consists of the following:

- Lewes District Joint Core Strategy: Local Plan Part 1 (LLP1) 2010-2030 (2016)
- Lewes District Local Plan Part 2 (LLP2) (2020)
- Newhaven Neighbourhood Plan (2017-2030) (2019)

- 5.7. The Development Plan policies considered to be of particular relevance to this proposal are listed below and can be found in Appendix A:

#### Local Plan Part 1

- Spatial Policy 7 (Land at Harbour Heights)
- Core Policy 1 (Provision of housing and employment land)
- Core Policy 2 (Housing Type, Mix and Density)
- Core Policy 4 (Economic Development & Regeneration)
- Core Policy 8 (Green Infrastructure)
- Core Policy 9 (Air Quality)
- Core Policy 10 (Natural Environment and Landscape)
- Core Policy 11 (Built and Historic Environment & Design)
- Core Policy 12 (Flood Risk, Coastal Erosion & Drainage)
- Core Policy 13 (Sustainable Travel)
- Core Policy 14 (Renewable and Low Carbon Energy)

#### Local Plan Part 2

- DM19 Protection of Agricultural Land
- DM20 Pollution Management
- DM22 Water Resources and Water Quality
- DM23 Noise
- DM24 Protection of Biodiversity and Geodiversity
- DM25 Design
- DM27 Landscape Design
- DM35 Footpath, Cycle and Bridleway Network

#### Newhaven Neighbourhood Plan

- E4 Employment Clusters
- T1 Congestion mitigation and sustainable movement

- R1 Recreation, leisure and local green spaces
- NE1 Biodiversity protection and enhancement
- D1 Promoting Good Design
- D2 Design and Climate Change
- H1 A spatial Strategy for Newhaven

5.8. Supplementary Planning Documents have also been adopted which add further detail to the Development Plan and are a material consideration in the determination of applications. These include:

- Sustainability in Development Technical Advice Note (2021)
- Circular Economy Technical Advice Note (2021)
- Biodiversity Net Gain Technical Advice Note (2021)
- Local Employment and Training (2021)

### **Emerging Local Plan**

- 5.9. The adopted Local Plan Part 1 is now over 5 years old (adopted May 2016, plan period 2010-2030) and the Council is currently at early stages of undertaking a review of the Local Plan in which LDC undertook an Issues and Options consultation in September 2021 as part of the emerging Local Plan Review. It is notable that LDC's Issues and Options identified a significant increase in its housing needs across the intended plan period (2020- 2040) to 12,400 dwellings (609dpa) from 6,900 dwellings (345dpa) in the current plan period (2010-2030), a circa. 75% increase. This demonstrates a substantial need for housing within the district.
- 5.10. The latest published Local Development Scheme dates July 2020 and will likely be updated shortly following the local elections that took place in May 2023.

### **Housing Delivery Test**

- 5.11. The Housing Delivery Test measurement was published by the Government in January 2022. The 2021 measurement confirms that LDC was required to deliver 709 homes over the last 3 years, and has delivered, over the same period, a total of 825 homes. This amounts to 116% of its requirement and as such the Council is not required to implement any necessary actions.

### **Housing Land Supply**

- 5.12. In accordance with the latest published housing supply position in April 2022 last year, LDC are only able to demonstrate a 2.73 years supply of housing as they are only able to supply 1,734 dwellings against the 3,165 5 year housing requirement. The lack of a 5 year housing position has been acknowledged within a planning appeal decision issued February 2023 (ref: APP/P1425/W/22/3299940).

## 6. Planning Balance Assessment

6.1. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 provides that all decisions must be determined in accordance with the Development Plan, when taken as a whole, unless other material 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.

6.2. This section identifies the key issues that are material to the planning balance required in respect of this scheme and presents a strong case in favour of the grant of planning permission. The relevant matters addressed within this section are as follows:

- **Principle of Development**
- **Employment Need and Delivery**
- **Housing Mix**
- **Design and Layout**
- **Residential Amenity and Noise**
- **Landscape and Open Space**
- **Heritage and Archaeology**
- **Coastal and Flood Risk**
- **Transport and Access**
- **Ecology**
- **Arboriculture**
- **Air Quality and Sustainability**
- **Section 106 Draft Heads of Terms**

6.3. The parameters and specific design and technical requirements for the 20 Ha proposal site, are considered in further detail below under relevant sub sections. The illustrative masterplan submitted with this application depicts all the uses specified by CS Spatial Policy 7 (Harbour Heights). The relevant technical reports that also accompany this planning application (which are considered in further detail below) demonstrate that there are no unacceptable adverse impacts that would significantly and demonstrably outweigh the benefits associated with the proposal.

### **Principle of Development**

6.4. In accordance with Paragraph 120 within the NPPF, the site is partially brownfield and situated within the built up area of Newhaven, and therefore by definition located within a sustainable location where planning policy seeks to direct development. The site has excellent public transport links and future occupants of the site will have access to a number of facilities such as shopping, sport facilities, dining and entertainment being approximately 1km to the south west of the Newhaven Town Centre. Local bus routes also provide regular services to other parts of Newhaven and to local towns such as Saltdean, Peacehaven and Brighton. Newhaven also benefits from two train stations located approximately 1km from the site, which provide sustainable access to Brighton and other settlements located within the wider East Sussex area.

6.5. The site is allocated for development in the adopted Core Strategy (2016) under Spatial Policy 7 (Land at Harbour Heights). As identified within Core Strategy Spatial Policy 2 (Distribution of Housing), delivery of the site for approximately 400 units will help contribute to the district-wide housing requirement of approximately 6,900 net new homes across the district throughout the Local Plan period (2010-2030). The

principle of development has therefore been fully established through the site's allocation under Policy SP7 (Land at Harbour Heights) to deliver a mixed use development of approximately 400 units across the 20 Ha site.

- 6.6. In addition to providing the much needed residential accommodation, the proposals seek to demolish the existing outdated industrial buildings on the site and replace with new high quality mixed use buildings as the existing employment uses on the site are not appropriate for a mixed use setting. The proposed replacement commercial development will be designed and delivered within a new mixed use area to provide high quality longer term commercial units for future occupiers that enhance the integration of businesses and residential communities.
- 6.7. Further to this, as part of the pre-application response received from the LPA back in August 2022 (PREAPP/21/0119), the principle of development has been acknowledged and the masterplan was considered as an exciting opportunity to provide a better defined urban edge to Newhaven. The proposal will also deliver the following benefits in accordance with Spatial Policy 7:
- **Ecology:** Biodiversity Net Gain of 10%
  - **Employment:** Provision of modern business units through a range of Class E opportunities.
  - **Housing:** Provision of approximately 400 family units
  - **Landscaping:** Robust landscaping strategy and new public open space.
  - **Transport:** Providing a range of on-site and off-site highways infrastructure alongside supporting sustainable transport through the implementation of a green Travel Plan. New pedestrian linkages through a north/south access to local schools will also be provided.
  - **Flooding:** Comprehensive flood risk and drainage strategy in the context that the site is in Flood Zone 1 (EA Flood Maps).
- 6.8. In terms of the Local Plan process, the current Local Plan Part 1 is considered out of date in which Paragraph 11 of the NPPF promotes the presumption in favour of sustainable development and confirms that development proposals that accord with the development plan are to be approved without delay; and where there are no development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission. Furthermore, the Council are only able to demonstrate around 2.7 years worth of housing supply as concluded within a recent planning appeal decision issued February 2023 this year (ref: APP/P1425/W/22/3299940).
- 6.9. On this basis, as there are no impacts arising from the proposal that significantly and demonstrably outweigh the significant public benefits the proposal will deliver, the principle of development should be fully supported. Technical matters can also be mitigated, either via the proposal itself, planning condition or Section 106 obligation, or where relevant further detail will be provided with the Reserved Matters. The proposal will also make a CIL contribution.
- 6.10. As the council is currently unable to demonstrate a five-year housing land supply, increased weight should be given to housing delivery when considering the planning balance in the determination of planning applications, in line with the presumption in favour of sustainable development set out in the NPPF (paragraph 11). Overall, for reasons set out above, the principle of development on this site has been fully established and outline planning permission should be granted.

## **Employment Need and Delivery**

### Existing Employment Context

- 6.11. Paragraph 81 of the NPPF states that *“significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”*.
- 6.12. Core Policy 4 (Encouraging Economic Development and Regeneration) sets out the LPA’s key strategic objectives for economic development being to maximise opportunities for re-using suitable previously developed land in addition to maintaining and enhancing the vitality and viability of the district’s town centres, retail centres and local centres as hubs for shopping, business, entertainment, cultural and community life.
- 6.13. The LDC’s economic priorities in the Core Strategy include:
- The need to address the identified lack of good quality modern business premises of all sizes in order to support the incubation, growth, and retention of local businesses and the District’s ability to attract inward investment
  - Work to deliver the regeneration of vacant, underused or poor quality sites and premises and improve accessibility, particularly in Newhaven
  - The need to address the inadequate access to good quality and high speed electronic/IT communications, particularly in view of its role in supporting home-working, rural employment, start-ups and business growth.
- 6.14. The Newhaven NP 2019 also identifies a number of key issues for Newhaven one being the clear gradual decline of manufacturing and industrial bases within the town. Concerns have also been cited in the NP over the physical appearance of Newhaven and the impacts of poor quality industrial buildings and heavy goods traffic.
- 6.15. In particular, Policy E4 c) of the Newhaven NP states that employment development should *“provide for development within Use Class B1 that accelerates Newhaven’s transition to a new and higher value economic role including: high end manufacturing encompassing the ‘clean, green and marine’; creative and digital; advanced engineering; environmental technology and services; and healthcare and biologics sectors”*.
- 6.16. The site currently contains existing outdated commercial buildings ranging from storage to office, light industrial and more heavy industrial operations. The majority of these buildings will soon be unoccupied given the emerging legislative requirements for all buildings to have an EPC level C and above from 2025.

Employment Type	Total sqm
B8 storage and distribution	3855 m2
B2 workshops	2370 m2
E use offices and workshops	2,579 m2
<b>Total</b>	<b>8,804 m2</b>

*Existing Employment Split Table 3*





Figure 10 Quarry Road Industrial Buildings

6.17. The key constraints to the viability of the existing industrial estate have been identified as follows:

- **Built status of existing commercial buildings** - The buildings located within the industrial estate are in a poor state and are at the end of their economic lifetime.
- **New Legislation** - The Minimum Energy Efficiency Standards (MEES) legislation has put in place that by April 2030 all non-domestic rented buildings must have an EPC of A or B. It will prove difficult to retrofit these buildings up to 21st century standards, and therefore the buildings will likely become increasingly vacant and hard to re-let over time.
- **Market Demand** - The Lewes Economic and Employment Land Assessment (EELA) (2010) scored the site low with regards to market attractiveness due to the poor quality and age of units, a number of which are currently vacant (including the Artex unit that covers a significant proportion of the site).
- **Poor vehicle access** – The vehicle access to the quarry is challenging for commercial vehicles.
- **Incompatible uses** - The long term use of these units would have implications for the future development of this allocated area as there would be conflict between new residential uses and the outdated B2/B8 uses due to potential noise and amenity issues.

#### Employment Need and Demand

6.18. An Economics and Social Value Assessment report produced by Savills Economics team has been submitted with this application assessing local and regional demand identifying that jobs in the manufacturing sector are forecast to decline by 4% over this period, in line with trends already being seen in Lewes. Between 2020 and 2030, Oxford Economics data indicates that jobs in office-based sectors will grow by 27%, led by the 'professional, scientific and technical' (61%), 'business administration and support services' (37%) and 'information and communication' (34%) sectors.

6.19. By encouraging local start-ups and the expansion of smaller local firms by providing a range of suitable, small, flexibly managed units, the proposal is seeking to deliver new commercial floorspace that can support Newhaven's objective to transition to a new and higher value economic sectors. In accordance with Policy 7, as the existing buildings are no longer fit for purpose, the proposal will demolish the existing buildings on site and replace with new high quality Class E employment which will significantly enhance their surroundings. The proposed employment floorspace requirements and proposed number of full time jobs are set out below:

Employment Type	Total sqm proposed	Floorspace requirements ( <i>Savills Economics 2023</i> )	Total amount of FTE employees ( <i>Savills Economics, 2023</i> )
proposals	Approximately 1,500 sqm	1,329-1,468 sqm	63 FTE employees

*Table 1 Proposed Employment Mix*

- 6.20. In terms of proposed employment, the proposal has the potential to provide up to 63 FTE jobs in total. As demonstrated within the accompanying economics report (Savills, Economics 2023). The proposal has therefore been demonstrated to meet the majority of Class E floorspace requirements.
- 6.21. The proposal will provide for a total of approximately 1,500 sqm of employment use in modern, high quality, energy efficient buildings with high EPC ratings, with layouts suitable for incorporating a range of unit sizes and types that are flexible, with good natural light, suitable for sub-division and configuration for new uses and activities. This is particularly relevant in light of the post COVID situation where floorspace needs to be adaptable to different business activities and changing requirements in order to achieve suitable long term viable use.
- 6.22. It is important to emphasise that these local flexible commercial spaces will not detract from the town centre, rather they will offer a local convenient office options for both the immediate and wider community. Overall, the redevelopment of the site is set against the government drive to re-use brownfield land that is under-utilised, vacant and in highly accessible locations. The proposals are therefore compliant with CS Policy 4 and the NPPF.

#### Economic Benefits and Social Value

- 6.23. Savills Economics in the accompanying Economic Statements calculates the proposals economic and social value and it has been demonstrated that the proposal will generate an additional £16.5 million in economic value and around £7.1 million in social value.
- 6.24. The Economics and Social Value of the proposed development are wide-ranging and significant, and in many cases inextricably linked to the sustainability of the proposed development. They are detailed in Table 5.1 within the accompanying Savills Economics Report but a summary has also been provided below.
1. *Approximately 188 jobs per annum created over the assumed 2 year construction period*
  2. *Around 125 jobs created on site from the proposals*
  3. *Around 8.5 million estimated gross value to be generated per annum from on-site jobs*
  4. *Around 76,000 of estimated social value to be created during construction*
  5. *Approximately £8,000 from work placements*
  6. *Around £57,000 NHS savings during the construction period*
  7. *£7.1 million of total social value achieved.*
- 6.25. On this basis, the proposals are considered to fully comply with and assist in meeting economic objectives at both the national and local levels. The proposals and therefore fully in accordance with the relevant development plan policies.



## Housing Mix

- 6.26. Whilst this application is an outline application with all matters reserved apart from access, the proposals have been prepared with an illustrative masterplan, setting out how development on the site can achieve the proposed quantum of housing whilst adhering to the principles set out in the relevant policies. This has been informed by a detailed topographical study, ecology surveys and detailed surface water drainage design.
- 6.27. NPPF paragraph 62 explains that the size, type and tenure of housing needed for different groups of the community should be assessed and reflected in policies. As part of CS Policy CP1, the LPA does not define a required mix for market housing and notes this should be refined on a case by case basis. Notwithstanding this, the LPA have confirmed there is an obvious district need for 1 and 2 bed units as evidenced within the 2012 Housing Register. The proposed unit mix therefore considers an appropriate balance between the different unit types responding to the identified local needs of the district.
- 6.28. The proposed mix is as follows:

Unit Type	Housing Mix
1 bed apartments	100
1 bed house	0
2 bed apartments	114
2 bed houses	44
3 bed houses	12
4 bed houses	121
5 bed houses	9
<b>Total</b>	<b>400</b>

- 6.29. Overall, the proposals offer a good balance of houses to be suitable for the districts need. Full details will be provided within the reserved matters applications and utilise the most up to date information to ensure the right mix comes forward.
- 6.30. All proposed residential dwellings will meet Nationally Described Space Standards.

## Design and Layout

- 6.31. NPPF paragraph 126 places great emphasis on the creation of high-quality, beautiful and sustainable buildings and places. Further to this, NPPF paragraph 130 sets out specific criteria that developments should achieve. CP11 (Built and Historic Environment and High Quality Design) also states that the LPA will seek to secure high quality design in all new development in order to assist in creating sustainable places and communities.
- 6.32. Thorough analysis of the site and its surrounding context has been undertaken to ensure the proposed design strategy is appropriate for the site's location. Given that this application seeks outline planning

permission, it is considered that at this stage the fundamentals of the design should be established but not details.

- 6.33. The submitted design prospectus utilises the existing site topography well, concentrating multi-storey commercial and residential buildings towards the Port Quarter, which would occupy the existing Trafalgar Business Estate site. This part of the site is effectively in an amphitheatre, bordered on three sides by significant chalk cliffs. This would allow taller buildings to be constructed without significant visual impact beyond the immediate area of the site. Beyond the quarry site, to the west, it would be expected for the scale of dwellings to be comparable to existing dwellings on Court Farm Road and residential development to the north (2 to 3 storeys).
- 6.34. The proposed layout responds to the constraints and characteristics of the site, most notably the existing landscape, and has resulted in key landscape features being retained and enhanced to provide a mature landscape setting (please see the accompanying Landscape and Visual Appraisal). Dwelling location and orientation has been carefully considered in the formulation of the layout, so that the relationship between the dwellings and the landscape features ensure that appropriate space is given. The scheme has also been designed to ensure natural surveillance and the retention of a feeling of safety and security at all times.
- 6.35. The range of dwelling types within the layout have been considered so that they are located within the natural features of the landscape, but still create a varied and interesting streetscene and are not homogenous and repetitive. The layout also incorporates a number of pedestrian routes from the site that will allow for quick access, ensuring ease of movement around and beyond the site for new and existing residents notably to the schools.
- 6.36. The site will have three character areas – The Port Quarter, Mariners Village, and Sunset Heights. The character areas will be defined by building materials, design, urban form, landscaping and planting. The character areas are subtle variations of each other, to ensure variation as well as cohesiveness but will assist in defining the development and creating a sense of place within the scheme.
- 6.37. The densities will vary throughout the site to create different character areas. Within the eastern section of the site, adjacent to the main access entrance, densities will be higher and towards the edges of the site to the west the densities will be lower. It is considered that this density strategy makes efficient use of land, provides sufficient space to occupy the allocated dwellings and allows for different character areas to be defined within the development. In addition to this, the proposed density takes account of existing densities within Newhaven. As such, the density strategy is in accordance with NPPF paragraph 124, Policy 2 and the Newhaven NP.
- 6.38. The proposals will also deliver two main access points and visibility splays in detail connected by a main access spine road, which will run on an east/west alignment from the existing Court Farm Road/ Quarry Road junction through to a restricted secondary access (for emergency vehicles, pedestrian and cyclists) at the western end of Court Farm Road. The main access road will be designed to accommodate a two way bus route through the ‘spine’ of the development.
- 6.39. The detailed proposals also provide permeability through the site by including detail on pedestrian and cycle access. Please see the Transport Assessment for further information and detailed access drawings.

### **Residential Amenity and Noise**

- 6.40. The proposed scheme has been sensitively designed to respect the residential amenity of surrounding dwellings and to ensure that residential amenity of future residents is also respected. The proposed site layout has been carefully considered in relation to site's constraints to ensure appropriate orientation of development.
- 6.41. The nearest affected properties are along Court Farm Road to the south of the site. Having regard to the residential amenity of these properties, the proposed development has been carefully orientated to avoid direct overlooking. Existing vegetation has been maintained along the southern boundary of the site with a sufficient buffer to avoid any direct overlooking. In relation to existing residential properties located to the north along Gibbon Road, these are located a substantial distance away where existing and proposed boundary planting will provide appropriate buffer land physically separating the properties from the development site.
- 6.42. In respect of proposed occupiers, the scheme has been designed to provide for the highest quality living environment with units that meet appropriate space standards with external balcony amenity space and private rear gardens. A cricket ball strike assessment has also been commissioned by Labosport in order to understand appropriate distances from the school sport pitches,
- 6.43. Ensuring the protection of residential amenity from noisy activities is critical to the delivery of a satisfactory residential living environment. Paragraph 185a of the NPPF states that planning policies and decisions should mitigate and reduce potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.
- 6.44. Anderson Acoustics Ltd have been commissioned to undertake a noise assessment for the proposals. In accordance with the local noise policy in the form of the Planning Noise Advisory Document: Sussex 2021, the suitability of the site for the proposed residential use has been assessed. This indicates that the majority of the site is of negligible risk in terms of noise impact, but with some areas that maybe of low risk that can be mitigated effectively through appropriate glazing and ventilation to be determined at Reserved Matters stage.
- 6.45. As far as is possible to demonstrate at this stage, the proposals are considered local and national (noise) policy compliant.

### **Landscape and Open Space**

- 6.46. CS Spatial Policy 7 states the proposal must provide for robust landscaping, which is appropriate to a coastal location, within and around the site to mitigate the impacts of this edge of town site on the surrounding landscape, having particular regard to views from and into the National Park. Core Policy 10 (Natural Environment and Landscape Character) also states that the natural environment of the district, including landscape assets, biodiversity, geodiversity, priority habitats and species and statutory and locally designated sites, will be conserved and enhanced.
- 6.47. The eastern part of the site (currently occupied by commercial development) is relatively well contained due to surrounding topography and the built environment, the remainder of the site is in an exposed cliff top location resulting in relatively high levels of visibility from the surrounding rural and urban environment, including from the South Downs National Park. The site is located on an east facing downland slope to the west of the river Ouse. The Lewes District Council and South Downs National Park Authority Landscape Capacity Study (2012) appraises this general area as being fairly visually sensitive but with some capacity for development within a strong landscape structure.

- 6.48. On this basis, a Landscape and Visual Assessment (including wireframes) has been undertaken by Davies Landscape Architects identifying that the overall value of the western area to be moderate with the quarry area to be of low/negligible value.
- 6.49. In terms of mitigation, the LVIA recommended for the proposals to include tree and hedgerow planting in order to infill and enhance existing field edges that will act as a buffer to neighbouring residents. This, alongside the soft landscaping and the provision of footpaths, will create a natural buffer between the northern and southern part of the site and neighbouring properties. The planting of further hedgerow throughout the site will create a species-rich environment, and the planting of natural species in grassy areas will further serve to enhance both visual appearance and biodiversity on the site. The increased planting will also help create new green links that run around the site, and enhance the connectivity to its surroundings.
- 6.50. On the basis of the adopted landscape strategy, the LVIA concludes that the site does not contain any features that contribute to the landscape character area. Furthermore, the mitigation measures will afford future screening/filtering of the development.
- 6.51. In terms of long and middle distance views, the LVIA confirms there to be no negative effects on the SDNP as a result of the proposals. Furthermore, from the long and middle distance views to the north and east the site becomes a natural extension to the existing townscape without notable cumulative effects.
- 6.52. Overall, the open space strategy will include parks, accessible play areas and a wide range of equipped children's play area. The largest area being the creation of Shell Park will be located central to the site. The steep topography of this part of the site will be utilised to create a distinctive new park for Newhaven which could encompass a range of features such as amphitheatre type spaces, elevated board walks and sun soaked south facing slope for relaxing and spending time in. Planting strategies will be focused on a palette of species which are hardy and suited to the coastal climate.
- 6.53. In terms of open space, the District Local Plan Part 2 (Policies DM15 and 14) identifies a minimum standard for outdoor play space of 2.15 ha per 1000 population for outdoor playing provision. Based on an average household size of 2.4 (or 960 residents across the proposed 400 dwellings), the LVIA includes Figure 11 below setting out the proposed level of open space contribution against the required Fields in Trust provision:

Table 02 - Formal open space (Policy DM15)

Typology	Per 1000 (ha)	Per person (m)	Req. (m)	Provision
Playing Pitches, inc bowling greens & Tennis courts	1.6h	16	15360	off-site contribution
Equipped Childrens Play	0.25	2.5	2400	2400m <sup>2</sup>
Neighbourhood equipped area of play (NEAP)				1No.
Local equipped area of play (LEAP)				1No.
Local area of play (LAP)				5No.
Other outdoor provision (MUGA/Skate/board Park)	0.3	3	2880	off-site contribution

Table 03 - Formal open space (Policy DM15)

Typology	Per 1000 (ha)	Per person (m)	Req. (m)	Provision
Parks and Gardens	0.8h	8	7680	9493m <sup>2</sup>
Amenity Green Space	0.6	6	5760	6216m <sup>2</sup>
Natural and Semi Natural (+ additional ecology areas - see 3.1.10)	1.8	18	17280	19684m <sup>2</sup>

Figure 11 Open Space provision

- 6.54. The above clearly indicates an overprovision of open space within the proposals. In addition to the above, the proposals will also provide around 1883 m2 of drainage suds, 32122 mm2 of native woodland/ scrub and 27015 m2 of ecology areas outside of the semi natural typology, both of which form an important aspect of the wider habitat links and create a positive contribution to the green infrastructure strategy. Overall, as shown in the accompanying land use parameter plan submitted with this application, the site offers over 50% to green space. Overall, the Proposal accords with the NPPF, Core Strategy policies.

### **Heritage and Archaeology**

- 6.55. Paragraph 194 of the NPPF requires an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The paragraph continues by stating *“Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk based assessment and, where necessary, a field evaluation”*.
- 6.56. Local Plan Part 2 Policy DM33 (Heritage Assets) states development affecting a heritage asset will be permitted where the proposal would make a positive contribution to conserving or enhancing the significance of the heritage asset, taking account of its character, appearance and setting. A Heritage Statement by Archaeology South East has been undertaken and submitted in support of this application. The accompanying Heritage Statement reviews the significance of designated and non-designated heritage assets within the vicinity of the site.
- 6.57. The site itself is not subject to any statutory or non-statutory built heritage designations. There are however two scheduled monuments within 1km of the site including Bowl Barrow on Peacehaven Heights, 242m south-west of Warren Court and the Newhaven Military fort and Lunette Battery. There are no Listed Buildings recorded within or immediately adjacent to the site. Fourteen Listed Buildings are however recorded within the heritage assessments study area (all of which are at least 450m from the site). The Newhaven Church Hill Conservation Area also lies 430m north of the site.
- 6.58. In summary, given the distance and topography from the designated assets, the heritage statement concludes that the proposal will cause no harmful physical or setting impacts to the designated heritage assets and Conservation Areas. Based on the findings, the proposed development complies with the relevant requirements of Local Policy, to respect the surrounding area.
- 6.59. The heritage report also assesses the potential impact of the proposal on non-designated heritage assets, including archaeological remains. Given its location in an Archaeological Notification Area. The desk based assessment concluded that the site had a moderate to high potential for certain archaeological deposits and therefore a geophysical survey was recommended to be carried out.
- 6.60. A Geophysical survey was subsequently undertaken in July 2022 by Archaeology South East where the magnetometer survey recorded no magnetic responses that could be interpreted as being of definite archaeological interest. Notwithstanding this, some responses have been detected which correspond with a feature recorded in the HER records. The HER records a prehistoric mound at this location within the site however, given the strength of the anomalies it is likely that they are probably WWII defensive structures. On this basis, further field work is necessary however the County Archaeologist has confirmed that any further field work required could be secured through condition.
- 6.61. To summarise, subject to imposition of conditions securing further archaeological investigation the proposal is considered to accord with the heritage requirements of the NPPF and Development Plan.

## **Coastal Management and Flood Risk**

- 6.62. The site is located within 100m of the Newhaven Cliffs and therefore careful consideration has been given to the Beachy Head to Selsey Bill Shoreline Management Plan. As part of this management plan, it has been identified that the recommended long-term plan for Newhaven Harbour to Peacehaven Heights is to manage the realignment of the coastline with no active intervention for erosion in the immediate to medium term to occur.
- 6.63. Spatial Policy 7 states that the development must maintain the undeveloped nature of the cliff top coastline, and avoids exposing new development to coastal erosion risk, by ensuring a sufficient undeveloped area from the cliff edge to the most southerly point of development. Further to this, the pre-application response from the LPA confirmed that the development should be set back a suitable distance from the cliff to ensure development is designed to allow for an appropriate 100 year time horizon taking into account predicted erosion rates.
- 6.64. The applicant has investigated the erosion rates of the cliff by instructing Herrington Consulting Ltd to undertake a Coastal Erosion Study, which accompanies this application. The Coastal Study's primary objective is to make predictions as to the likely position of the clifftop in 100 years time using interpretative analysis of existing information. On this basis, the minimum 100-year erosion distance has been assessed as being between 22m and worst case scenario being 53m. These distances have therefore been taken into consideration when developing the masterplan and the worst case scenario adopted on a precautionary basis. Overall, this set back is considered entirely suitable and will create a natural buffer between the southern boundary of the application area and cliff edge.
- 6.65. Paragraph 163 of the NPPF states that, when determining planning application, LPAs should ensure that flood risk is not increased elsewhere and where appropriate, applications be supported by site-specific Flood Risk Assessments (FRA).
- 6.66. A Flood Risk Assessment and Drainage Strategy (FRA) (Herrington Consulting) has therefore been prepared and submitted as part of the application. The FRA undertaken for the site identified that the risk of flooding from all sources is low with the exception of flooding from surface water in which detailed site specific modelling has therefore been undertaken (Please refer to Appendix A.7 within the FRA).
- 6.67. The detailed modelling (please see Figure 12 below) has identified three surface water flow paths within the site. In order to ensure that the development does not put future residents of the site at increased risk of flooding all proposed buildings have been located outside the flow paths. The proposals will provide a betterment by introducing green and blue corridors to the flow paths with retention areas to reduce the volume of surface water flowing across the site during extreme weather conditions when compared to the existing day situation. Please refer to the accompanying FRA for further detail.



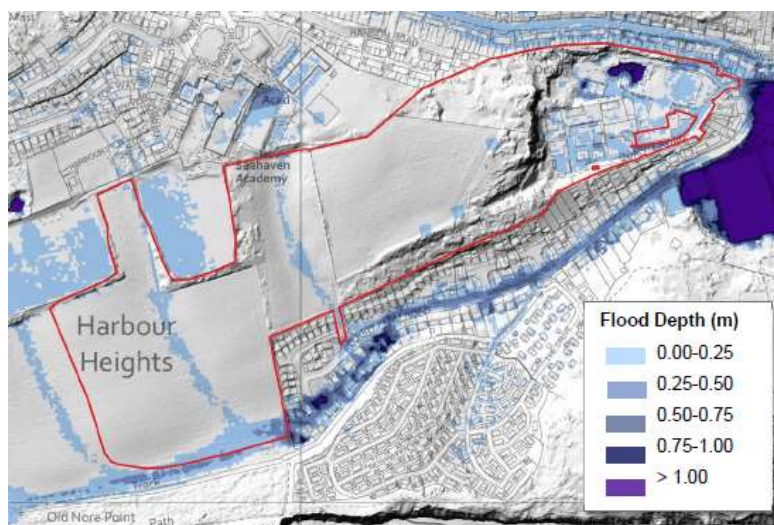


Figure 12 Flood Modelling Data (Herrington Consulting, 2023)

- 6.68. In terms of the proposed surface water strategy, the accompanying FRA includes a surface water drainage plan, which sets out the permeability of the surfaces within the site as well as the location of the comprehensive network of proposed attenuation ponds and blue corridor routes across the development area. Overall, the proposals include the provision of suds, underground storage and permeable paving in order to not increase the risk of flooding elsewhere. The proposed surface strategy will therefore subsequently reduce the peak discharge rates from the site as close to the greenfield runoff value as reasonable practicable before discharging to the public sewer.
- 6.69. In terms of foul drainage, due to the sites topography and proximity to the public sewer, the most viable option is for the proposals to connect to the existing public sewer running along Court Farm Road. Foul capacity checks will be undertaken with Southern Water at a detailed design stage.
- 6.70. Overall, the site drains adequately and as such, the proposed development is in accordance with national and local planning policy in this regard. The production of detailed drainage strategies can be conditioned as part of the RM process.

### Transport and Highways

- 6.71. The scheme is in full compliance with CP13 (Sustainable Transport) which promotes and supports development that encourages travel by walking, cycling and public transport and which reduces the proportion of journeys made by car.
- 6.72. The accompanying Transport Assessment (TA) (Mayer Brown, April 2023) considers the site's accessibility to existing modes of sustainable transport, details of the proposed access arrangements and assesses the traffic conditions post completion of the development.
- 6.73. The TA confirms that the site will be well connected by footways and cycle links that provide pedestrian and cycle access to the Newhaven Town centre. The routes provide safe access to everyday services and facilities including education facilities, doctors, leisure facilities, eateries and local convenience stores. The site is also well served by public transport such as local bus stops including Gibbon Road Lower located approximately 50 metres to the north along Gibbon Road, which has regular services to Brighton and other

towns within the East Sussex area. The site is also located around 1km to both Newhaven Town and Newhaven Harbour Train Stations, which provide regular services to Brighton, Lewes and Seaford areas.

6.74. The proposed access arrangements being sought in detail as part of this outline scheme comprise two vehicle access points into the development consisting of:

- a main vehicle access from Quarry Road to allow all users (including a shuttle bus service) to ingress and egress from this access safely.

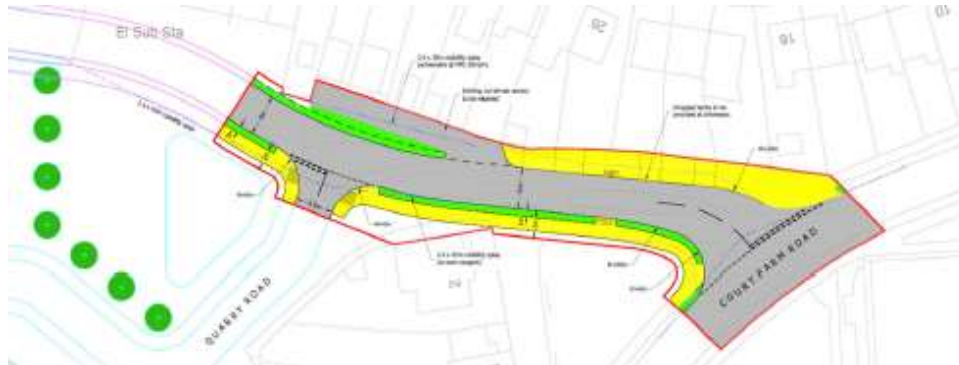


Figure 13 Proposed Main Vehicle Access, Quarry Road (Mayer Brown, 2023)

- A secondary restricted access from Court Farm Road is being proposed to the south of the site. As a result of the public concerns relating to traffic creation along Court Farm Road, this access will be restricted for emergency vehicles, pedestrians and cyclists controlled by electric bollards to limit congestion along Court Farm Road.



Figure 14 Proposed Secondary Access, Court Farm Road (Mayer Brown, 2023)

6.75. The Illustrative Masterplan has also been prepared to demonstrate how the site could be developed in a way that accommodates sufficient car parking in accordance with ESCC parking standards to be agreed at RM stage. An internal road and footway network has been successfully designed to deliver safe access for all, including pedestrians, cyclists, service and emergency vehicles. Each home will also have convenient, secure cycle storage, in line with the adopted standards at the time of the reserved matters application.



- 6.76. In terms of sustainable transport, a bus route is proposed through the site and designed to allow for a turning area within the site to allow for buses to ingress and egress from the eastern access. The applicant is willing to sponsor (through section 106 contributions) a new shuttle bus service to serve the proposals providing services to the town centre. CIL contributions connected with the proposed development could also be used to extend the Brighton bus service (number 12) to serve the development at a later date.

#### Traffic Generation Impact

- 6.77. The TA also considers the traffic impacts arising from the proposals on the Newhaven Gyratory, the A259 towards Brighton and the local network.
- 6.78. In terms of the operation of the gyratory, the development proposals are consistent with the quantum of development tested as part of the gyratory assessment contained in the adopted Local Plan. In relation to the adjacent Newhaven Marina development (application reference LW/19/0926), ESCC Highways accepted that compliance with the Local Plan Evidence Base, meaning that the development impact would be consistent with that understood and accepted as part of the Local Plan evidence base. The highways impact is therefore considered acceptable as already planned and evidenced by the LPA.
- 6.79. In terms of highways impact on the A259, ESCC Highways have sought as a target for development in this location, that there is nil-detriment in terms of the operation of the A259. The TA therefore evidences the proposed changes in flows on the A259 arising from the development. In order to mitigate against any increased traffic flows, the proposals will provide the following measures:
- The Implementation of a Better Points Campaign
  - The implementation of a Smarter Choices Campaign
  - The implementation of the Bus Strategy
  - Assistance to work from home
  - The provision of a Car Club
  - The implementation of a Travel Plan to include a Cycle Strategy/Fiscal Incentives and Marketing initiatives
- 6.80. As a result, the nil-detriment assessment undertaken within the accompanying TA has demonstrated that the proposal will meet the nil detriment target.
- 6.81. Regarding local highways impacts, a highways audit and traffic surveys were undertaken by Mayer Brown on South Road previously to understand the existing issues that affect the operation of the road. In terms of the local junction assessments undertaken, the TA demonstrates that priority junctions have been operating under capacity. Notwithstanding this, local concerns were discussed with members of the public during the public consultation event held in 2022. A number of local highways issues were noted including:
- Cars parking on double yellow lines narrowing the width of the road to a single carriageway at points;
  - Faded road markings making it difficult to understand restrictions and road markings;
  - Large potholes along the length of the road causing vehicles to slow down at a number of points along the road; and
  - Cars parking on grass verges.
- 6.82. In order to help improve local congestion, the applicant is willing to offer section 106 contributions towards off-site highways improvements to South Road, which will improve the operation of the road and reduce

congestion. Potential improvements that could be implemented are set out in the TA and consist of measures such as increased parking enforcement to reduce parking on double yellow in addition to the repainting of road markings (Please see table 8.1 in the TA).

- 6.83. Overall, the proposal fully accords with the NPPF in ensuring that *'opportunities for sustainable transport modes have been taken up and steps taken to minimise the need to travel and maximise the use of sustainable modes of transport'*. The residual effects are that no significant impacts are considered to arise from the proposed development.

## **Ecology**

- 6.84. The habitats on the site are contained within a large expanse of rolling semi-natural grassland, former arable land with dominant ruderal species, and dense scrub banks. This large complex, directly connects to designated nature sites including SSSI, LWS & LNR, and supports an important area of uninterrupted pollinator habitats including a revegetating arable field.
- 6.85. Paragraph 174 of the NPPF states that planning decisions *'should contribute and enhance the natural environment'*. Planning decisions are to achieve this aim by *'protecting and enhancing sites of biodiversity value, recognising the benefits from natural capital and the ecosystem'* and *'minimising impacts on and providing net gains for biodiversity'*.
- 6.86. The conservation and enhancement of wildlife is an important consideration in designated areas as per paragraph 176 of the NPPF.
- 6.87. An updated Preliminary Ecological Appraisal (PEA) and Ecological Impact Assessment (Lizard Landscape Design and Ecology 2022) supports the application in order to provide mitigation and compensation measures for the proposed development. The updated PEA was previously undertaken in March 2022 and identified the site to have potential for supporting bats, reptiles, badgers and nesting birds. Further survey work was therefore recommended in respect of bat, reptile, breeding birds and badgers in which targeted species-specific survey work was therefore undertaken previously on site. The findings of these surveys have been summarised below.

## **Bats**

- 6.88. In accordance with current best practise guidelines (BCT, 2016), a single bat emergence survey of three buildings was completed by the project team ecologist on the 7th July 2022 to ascertain the presence / likely absence of a roost within the buildings. No bats were seen to emerge from the buildings at any time during the survey period.
- 6.89. Overall, bat activity was very low during the survey in which the results of the survey strongly suggest the likely absence of a bat roosts within buildings. No further survey visits or any mitigation measures were therefore recommended to be required. Overall, the scheme is considered highly unlikely to contravene the protection afforded to bats under The Conservation of Habitats and Species Regulations 2017 (as amended).
- 6.90. Some enhancement measures will however be included within the scheme through the installation of bat boxes to the southern aspect of new buildings and trees.

## **Badgers**

- 6.91. Given the presence of badger setts, a recommended period of badger sett monitoring and bait marking was subsequently undertaken for a period of 21 days in May and June 2022. A single annex sett was subsequently identified as well as a number of latrines within the site.
- 6.92. Given the outline nature of the application, the exact impacts of the works shall be determined during the detailed design stage at reserved matters, and shall include a more detailed survey of all surrounding scrub to allow the location of the main sett to be established. If the design of the access route and footpath is considered likely to cause damage and / or disturbance to the existing setts then a licence shall be sought from Natural England to close up the sett as necessary.

### **Reptiles**

- 6.93. 120 no. artificial reptile refugia were laid out around the site between the 23rd and 27th of June 2022. Mats were distributed along each field margin, as well as across the centre of the central and eastern field parcels. Refugia were allowed to bed-in for 18 days prior to survey visits beginning on the 15th July 2022.
- 6.94. The results of the survey recorded a peak count of 14no. adult slow worms, 1no. adult adder and 11no. adult common lizards on site. To ensure the protection of reptile species on site, a combination of translocation of reptiles from the construction zone, and retention and protection of areas of existing habitat shall occur. A reptile receptor site has been identified as part of this application and a reptile mitigation strategy will be proposed as part of the reserved matters application to demonstrate a suitable mitigation and enhancement strategy for reptiles and associated negative impacts.

### **Breeding Birds**

- 6.95. Lizard Landscape Design and Ecology was also commissioned by the applicant to complete an updated breeding bird survey of the site. The species recorded nesting within the main body of the site was skylark, which held 9no. territories. 6no. of these territories were recorded within the western-most fallow arable field, with 3no. territories recorded across the fields to the east.
- 6.96. The layout therefore includes retention of existing dense scrub to the northern and southern boundaries of the site, as well as creation of new areas of scrub and tree planting. Compensation for the loss of skylark nesting habitat is also to be provided through the enhancement and management of an additional piece of land within the client's ownership, which lies approximately 400m west of the proposed development.

### **Assessment/Conclusion**

- 6.97. The Ecological Assessment sets out a number of mitigation and enhancement measures to ensure existing habitats are protected and enhanced where appropriate. The landscaping strategy includes a variety of species rich habitats and will comprise tree and woodland planting, native hedgerow planting, species rich wildflower grassland establishment, marginal planting, scrubland planting, biodiverse green roofs and ornamental planting to the entrance of the site.
- 6.98. In terms of Biodiversity Net Gain (BNG) and based on the above enhancement measures, Lizard Landscape and Ecology has calculated that the proposal will provide a BNG of over 10% exceeding the mandatory Environment Act 2021 requirements coming into force in November 2023.
- 6.99. The approach to Ecology matters and BNG accords with saved local and national policy, and the proposed measures can be secured by relevant condition. The proposals fully accord with Paragraphs 180 and 182

of the NPPF and should be supported given the proposals to significantly enhance biodiversity. The Proposed Development is therefore acceptable in relation to ecology and BNG matters.

### **Arboriculture**

- 6.100. The NPPF takes a holistic approach, recognising the wider benefits of enhancing the natural environment. Paragraph 174 requires *“planning policies and decisions to contribute to and enhance the natural environment through recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland”*.
- 6.101. The proposals have sought to retain existing trees wherever possible, and a Tree Report has been prepared in order to understand the status of the existing trees on site, and to ascertain the impact of the proposals on the trees. This assessment has been used to shape the development proposals, and to ensure that impacts are minimised.
- 6.102. As detailed in the Assessment and the tree protection plan no dwellings will be constructed within a Root Protection Area (RPA). In summary, the Arboricultural Report has found that the proposals are acceptable from an arboricultural perspective, with a low potential for negative impacts on retained trees.

### **Air Quality and Sustainability**

- 6.103. An Air Quality Assessment (Savills Infrastructure) has been submitted as part of this application. It has sought to determine whether there will be any air quality impacts through the construction and operational phase of the development, and if there will be any local or long term impacts.
- 6.104. Overall the Air Quality Assessment demonstrates that the residual effects of construction dust and emissions from construction plant/vehicles upon the local area are temporary and considered to be ‘not significant’. The proposed mitigation will ensure that the development will not result in any unacceptable effects upon the health, amenity or natural environment of the surrounding area during the construction process. Notwithstanding this, measures to offset emissions will be in place including EV vehicle infrastructure and the provision of cycling and walking infrastructure.
- 6.105. The air quality mitigation is considered appropriate for the proposals, in accordance with Air Quality and Emissions Mitigation Guidance for Sussex. Thus, the proposed development is in accordance with the air quality requirements of the NPPF and Policy 9 of the Lewes District Council Local Plan Part 1.
- 6.106. In terms of energy, sustainability is central to the applicants initiative for the development. An energy strategy has been produced to support the outline planning application. In summary the energy strategy demonstrates the proposals strategy for sustainability to include the following:
- Residential energy strategy: The development will target a minimum 20% reduction in Regulated CO2 emissions [over Part L1 2021] through energy efficiency measures and an air source heat pump [ASHP] led heat network.
  - Commercial energy strategy: The development will target a minimum BREEAM Excellent rating for all new build commercial spaces.
  - Water efficiency: Flow control devices and water efficient fixtures and fittings will be installed in all dwellings to target a maximum water consumption of 110 litres/person/day. Rainwater butts will be installed to reduce the demand on potable water and promote effective use of water supplies.

- Design - The proposal seeks buildings to be appropriately located to maximise passive solar and natural heating and make appropriate use of soft landscaping. The buildings will be located wherever possible with a south facing roof to maximise the potential for solar.

6.107. A BREEAM Assessment has also been undertaken and submitted as part of this planning application, which demonstrates that the proposed will meet the policy standards for sustainable buildings. The assessment demonstrates that the non-residential aspects have the ability to target excellent to outstanding BREEAM standards.

6.108. Based on this technical information, the proposed development would comply with development plan and paragraphs 105 185, and 186 of the NPPF.

### **Contamination**

6.109. A Phase 1 Geo-Environmental Desk Study (Argll Ltd) accompanies the application reviewing potential contamination risks affecting the Site.

6.110. The Study concludes that risks from potential contamination sources are considered to be low risk and can be addressed through future site investigation.

6.111. The proposals therefore accord with the NPPF and Development Plan requirements in regard to contamination and creation of a safe living environment for future occupiers.

### **Draft Section 106 Heads of Terms**

6.112. The proposed development is in accordance with the national planning policy and local development plan. It is considered that the following S106 planning obligations will be likely required to mitigate the impact of the development:

- BNG mitigation and management;
- Open space contributions
- Sustainable transport and off-site highways Contributions; and
- Local training and employment contributions

6.113. The above is considered indicative, which will need to be determined as part of the planning application process.

## 7. Conclusion

- 7.1 This Planning Statement has been prepared by Savills, on behalf of Trafalgar Group and accompanies an outline planning application (with all matters reserved except for access) at Harbour Heights, Newhaven. Specifically, this application seeks:

*“Outline application with all matters reserved (except for means of access) for the development of circa 400 dwellings and approximately 1,500 sqm of commercial floorspace with associated community provision, amenity land, vehicle and cycle parking provision and associated infrastructure at Harbour Heights, Newhaven”.*

- 7.2 As part of the detailed element to this application, a new upgraded primary vehicular access into the site from Quarry Road is being proposed in addition to a restricted secondary access from Court Farm Road. The proposal has also been specifically designed to directly respond to local resident highways concerns through the following measures:

- To minimise through traffic along Court Farm Road, the Court Farm Road vehicle access will be restricted to use only by emergency services, refuse vehicles, pedestrian and cyclists;
- Provision of off-site local traffic calming measures through section 106 contributions;
- CIL or section 106 contributions towards funding a Brighton and Hove City Council (BHCC) bus service to serve the development.
- New pedestrian footways and cycle paths will also be provided within the site to provide a direct access route for High Cliff Academy and Seahaven Academy to the north of the site.

- 7.3 The site extends to 20 hectares and accounts for the land included within the CS Spatial Policy 7 (Land at Harbour Heights) strategic site allocation directly responding to the allocation boundary. This site represents a major development site in the District and its allocation secures a significant number of homes needed across Lewes. It has been demonstrated that the proposals deliver a wide range of social, environmental and economic benefits, including:

- **Ecology:** Biodiversity Net Gain of 10%
- **Employment:** Provision of modern business units through a range of Class E opportunities.
- **Housing:** Provision of approximately 400 family units
- **Landscaping:** Robust landscaping strategy and new public open space.
- **Transport:** Providing a range of on-site and off-site infrastructure alongside demand management and sustainable transport proposed including a Travel Plan. New pedestrian linkages providing north/south access for local schools.
- **Flooding:** Comprehensive flood risk and drainage strategy in the context that the site is in Flood Zone 1 (EA Flood Maps).

- 7.4 This site specifically is allocated for the development proposed and furthermore Lewes District cannot currently demonstrate a 5-year supply of deliverable housing sites. This Planning Statement has therefore demonstrated that the proposed development is acceptable in planning terms and in accordance with NPPF paragraph 11 should be approved without delay.

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