PLANNING & ECOSYSTEMS SERVICES STATEMENT 50 LEWES ROAD, DITCHLING, BN6 8TU



Whaleback Planning & Design 91 Boundary Road Hove BN3 7GA www.whaleback.co.uk	Site	50 Lewes Road, Ditchling
	Project	Full Planning
	Applicant	Mr & Mrs Beacroft
	Our Ref	W814
	Date	February 2024
	Version	20240131-MM

Contents

Contents	2
Introduction	3
Site and Surroundings	3
Development Proposal	4
Relevant Planning History	ō
Planning Policy Framework	ō
National Planning Policy Framework	6
South Downs Local Plan	6
SDNPA Purposes and Dity and Partnership Management Plan	6
Supplementary Planning Guidance	7
Planning Appraisal	7
Principle of Development	7
Landscape-led Approach to Design	8
Impact on Neighbouring Amenity	9
Dark Night Skies	9
Environmental Sustainability and Renewable Energy10	С
Ecosystems Services	C
Conclusion1	1
Engagement with the Local Planning Authority12	2

Introduction

- 1. Whaleback Planning & Design is instructed by the applicants to prepare and submit a planning application for the demolition of the existing bungalow and the erection of a replacement single-storey dwelling and outbuilding with associated works at 50 Lewes Road, Ditchling.
- 2. This Planning and Ecosystem Services Statement describes the application site and its surroundings, the development proposal, the planning history of the site and the relevant planning policy framework. A planning appraisal is provided to consider the merits of the application followed by a conclusion.

Site and Surroundings

3. The site comprises a four bedroom detached bungalow within the settlement boundary of Ditchling. It is accessed via a shared track from Lewes Road. The house was constructed in the 1970s as part of a matching pair (the other being no. 50A Ditchling Road to the east). The material palette is brickwork, hanging clay tiles, plain roof tiles and white UPVC fenestration. There is a driveway and lawn to the front of the property and a garden to the rear. The site is bordered by residential properties to the north and open fields to the south.



Existing front elevation

- 4. The site is located within the South Downs National Park. It lies within the Adur to Ouse Scarp Footslopes Landscape Character Area and 'Urban' Dark Night Sky Zone EN3.
- 5. The building is not listed nor is it situated within a Conservation Area. It is located within Flood Zone 1 and there are no designations that restrict development of the site in principle.

Development Proposal

6. Planning permission is sought for the demolition of the existing bungalow and the erection of a replacement single-storey dwelling. The replacement dwelling would be located in the same position as the existing, comprising bespoke masonry cast from the demolished brickwork, pigmented concrete plinth and lintels, a copper roof and triple-glazed aluminium fenestration. The existing garage to the front of the house would be replaced with a single-storey studio/gym building, finished in larch cladding and concrete roof tiles recycled from the existing house.



Proposed north and west elevations

- 7. The application scheme is a result of comprehensive research and numerous design iterations that have been directly informed by the landscape baseline and ecological assessment of the site, ensuring that the scheme is truly landscape-led. The submission is accompanied by a Landscape and Visual Assessment, Ecological Reports and Arboricultural Surveys which should be read alongside this statement. The scheme includes a number of ecological and landscape enhancements which are detailed in the Ecosystems Services section of this report.
- 8. In October 2023 pre-application advice was sought from the South Downs National Park Authority (SD NPA) in relation to a similar proposal for the site. That scheme involved the remodelling of the existing dwelling rather than a complete re-build, and a positive response was received. Overall the building form and design approach remains similar to the earlier proposals. However, following further analysis of the existing fabric and its suitability for upgrading and retrofitting, it has been determined that rebuilding the house from slab level upwards is a more viable solution than the previously proposed partial demolition/extension and retrofitting.



Pre-app proposal

Application proposal

9. The proposed building would be only marginally higher (700mm at ridge height) to the neighbouring property at 50A Lewes Road.. The floor area would be increased by approximately 75m² to provide a more practical family living arrangement for the applicants and their children. The house would remain a four bedroom property.

Relevant Planning History

10. In October 2023 pre-application advice was provided by the SDNPA under reference SDNP/23/03810/P RE. The advice concludes:

'In my opinion the proposed development is likely to be supported at the application stage.'

- 11. The advice letter states that the principle of extending the property over 30% is acceptable, the design approach is supported and the proposal would have an acceptable impact on neighbouring amenity.
- 12. A number of queries were listed in the pre-app response for clarification at application stage. Specifically:

The reflectivity of the copper roof; Potential impacts on Great Crested Newts; and Details of ecological enhancements.

13. These issues are addressed within this statement.

Planning Policy Framework

- 14. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to determine planning applications in accordance with the development plan, unless other material considerations indicate otherwise.
- 15. The Development Plan currently in force across the area relevant to the application site currently consists of the following adopted plans:

National Planning Policy Framework (2023)

South Downs Local Plan (2019)

South Downs Partnership Management Plan (2020)

Ditchling, Westmeston and Streat Neighbourhood Plan (2018)

National Planning Policy Framework

- 16. A presumption in favour of sustainable development is found at the heart of the NPPF, for both planmaking and decision-taking, defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 17. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): economic, social and environment. For decision-taking this means approving applications that accord with up-to-date policies without delay.

South Downs Local Plan

- 18. The South Downs Local Plan was adopted as the statutory development plan for the wh Park, and is used in the determination of planning applications. The Local Plan sets out how the National Park Authority will manage development over the next 15 years. This is based on the statutory purposes and duty for national parks as specified in the National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995.
- 19. The policies relevant to the determination of this application are:

Policy SD1: Sustainable Development Policy SD2: Ecosystems Services Policy SD4: Landscape Character Policy SD5: Design Policy SD8: Dark Night Skies Policy SD9: Biodiversity Policy SD 30: Replacement Dwellings Policy SD48: Climate Change and Sustainable Use of Resources

SDNPA Purposes and Dity and Partnership Management Plan

- 20. The Government has provided two statutory purposes for National Parks in England. All public bodies and utility companies, when undertaking any activity which may have an impact on the designated area, have a duty to have regard to these purposes.
- 21. The Government also places a corresponding social and economic duty upon National Park Authorities themselves – to be considered when delivering the two purposes. This reciprocal arrangement is designed to ensure a high degree of mutual cooperation, avoiding the risk either that the needs of National Park residents and businesses will be ignored, or that others will ignore its designation when undertaking activities.

Purpose 1: To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.

Purpose 2: To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

Duty: To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.

Supplementary Planning Guidance

22. The following supplementary planning guidance documents are also relevant to the proposal:

Ecosystems Services Technical Advice Note

Extensions and Replacement Dwellings Technical Advice Note

Dark Night Skies Technical Advice Note

Design Guide SPD

Planning Appraisal

23. The material planning considerations of the application relate to the principle of development, landscape impacts, design, impact on neighbours, impacts on the dark night sky zone and ecosystems services benefits.

Principle of Development

24. Policy SD30 of the Local Plan states that proposals for replacement residential dwellings outside settlement boundaries, as defined on the Policies Map, will be permitted where:

a) The structure, constituting all new and existing development, does not result in a net increase of more than approximately 30% compared with the gross internal area of the existing dwelling; and

b) The replacement dwelling is not overbearing or of a form which would be detrimental to the amenity of nearby residents by virtue of loss of light and/or privacy.

- 25. The application site is located *within* the settlement boundary, therefore the 30% limit would not apply. Notwithstanding, supporting paragraph 7.84 states that the purpose of this policy is to reduce the loss of small homes in the National Park through replacement by substantially larger homes. A small/medium sized dwelling is defined in the 'Extensions and Replacement Dwellings' Technical Advice Note as having a GIA of 120m² or less and/or having 1, 2 or 3 bedrooms.
- 26. The existing dwelling is above 120sqm and has 4 bedrooms which sits outside the definition of a small/medium-sized dwelling and is therefore considered to be a 'large' dwelling for the purposes of the TAN. Paragraph 3.6 of the TAN states:

'The loss of a house that is already large would not reduce the supply of small and medium sized homes in the National Park.'

27. The proposal would therefore comply with the objectives of policy SD30 and this was confirmed in the pre-application response as follows:

As the house is not currently defined as a small/medium dwelling the percentage limits in SD31 [and SD30] *(a) would not apply.*

- 28. Criterion 1(b) of policy SD30 is addressed under the neighbouring amenity section below.
- 29. With regard to the proposed replacement outbuilding, policy SD31 of the Local Plan states that proposals for outbuildings should demonstrate that they are required for purposes incidental to the use of the host dwelling. The proposed outbuilding would replace an existing garage, providing a study and personal gym. These uses would be entirely incidental to the main house and users would be dependent on the main house for bathroom facilities, meaning that it could not be used independently or become self-contained in the future.

Landscape-led Approach to Design

- 30. Policy SD5 of the Local Plan states that proposals will only be permitted where they adopt a landscapeled approach and respect the local character, through sensitive and high quality design that makes a positive contribution to the overall character and appearance of the area.
- 31. The SDNPA Design Guide states that for a landscape-led approach to be achieved, a logical design process should be followed including evidence-gathering, analysis, vision, landscape, concepts and detailed design.
- 32. The landscape evidence baseline of the site is set out comprehensively in the accompanying LVA document by Engleback Studios, a Chartered Landscape Architecture firm The applicant has undertaken numerous design iterations that have been directly informed by the landscape context, key views, biodiversity and geodiversity of the site. The resultant proposal is a low-key, contemporary and sensitive dwelling that reflects its setting in the landscape. Its single-storey form will allow continuous views from the village to the Downs beyond. Its limited height and siting within the village settlement boundary would appear in keeping with the surrounding built form when viewed from nearby public rights of way.
- 33. The replacement dwelling is an innovative design that seeks to sensitively re-work the building in a contemporary fashion. The existing dwelling is not of historic or architectural interest, being of modern 1970s construction. The extension does not seek to mirror or extend the existing house in a pastiche fashion, but rather, remodel the building to create an attractive, sustainable and sensitive built form that is worthy of regard in its own right. The use of innovative materials (including bespoke masonry, pigmented concrete and copper roofing) seeks to showcase sustainable and local materials through a contemporary but sensitive built form.
- 34. It is noted that the LPA requested further information about the tone of the copper roof, and its potential reflective. The copper will naturally weather within a three month period, and a physical sample of this will be provided to the LPA for consideration. The resultant tone will be muted and not reflective in wider views.



Axono metric view- north west

Impact on Neighbouring Amenity

35. The only neighbour likely to be impacted by the development is the adjoining property at 50A Lewes Road to the east. The ridgeline of the property would be raised only slightly compared to the existing house, therefore this would not cause any loss of light or sense of enclosure to this neighbouring property due to the separation distance between the two buildings. The distance to this neighbour would remain as existing, and will sit subservient to the neighbours building line. There would be no upper floor windows, therefore the privacy of neighbours would be protected. The proposal would safeguard the living conditions of neighbouring properties in accordance with criterion (b) of policy SD30.

Dark Night Skies

36. The site is located within the Dark Night Sky Zone EN3: Urban, albeit the site borders the E1a 'Intrinsic Rural Darkness' Zone to the rear boundary. Low-level external lighting is proposed only where necessary to reduce impacts on the dark night skies and wildlife. An internal lighting strategy is to be designed post-planning to control light spill, minimise external lighting and limit the impact of lights. A combination of tinted glass, automated external blinds and external light sensors (set by timeclock and lux) may be used. The roof overhang on the rear elevation of the building will limit vertical light spill from the glazing on the rear elevation.

Environmental Sustainability and Renewable Energy

- 37. Policy SD48 of the Local Plan states that the authority will encourage all new development to incorporate sustainable design features. The applicants and design team have taken a holistic approach to sustainability that considers embodied as well as operational carbon.
- 38. In terms of embodied carbon, the concrete foundation slabs of the existing house will be retained, and a timber frame structure will be used for both the house and outbuilding. The brickwork waste from the existing house will be recycled and incorporated into a bespoke masonry for the new walls. Some of the concrete roof tiles will be re-used on the outbuilding and the internal layout of the property will be adaptable for future owners.
- 39. The carbon footprint of the dwelling will be further reduced via the following design measures to reduce operational carbon:

The building fabric will have excellent insulating properties Passive energy strategy with consideration of solar orientation for shading and glazing to maximum natural daylight and control solar gain High efficiency, low emissive solar glass triple glazing Modern construction techniques to improve air tightness and minimise thermal bridging Efficient heating and ventilation control systems Low water consumption fittings and low energy lighting Installation of two car charging points.

Ecosystems Services

- 40. Policy SD2 of the Local Plan states that proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services. This will be achieved through the use of high quality design, and by delivering all opportunities to:
 - a) Sustainably manage land and water environments;
 - b) Protect and provide more, better and joined up natural habitats;
 - c) Conserve water resources and improve water quality;
 - d) Manage and mitigate the risk of flooding;
 - e) Improve the National Park's resilience to, and mitigation of, climate change;
 - f) Increase the ability to store carbon through new planting or other means;
 - g) Conserve and enhance soils, use soils sustainably and protect the best and most versatile agricultural land;
 - h) Support the sustainable production and use of food, forestry and raw materials;
 - i) Reduce levels of pollution;
 - j) Improve opportunities for peoples' health and wellbeing; and
 - k) Provide opportunities for access to the natural and cultural resources which contribute to the special qualities.
- 41. The application is accompanied by an Ecological Impact Assessment (EIA) prepared by Imprint Ecology, an accredited ecology consultancy. The EIA concludes that no protected species habitats were identified on site (including bats- as a result of a bat emergency survey) and the proposal is considered to have a negligible impact on bats and other ecological features.
- 42. The EIA includes a number of ecological enhancements, which the applicants intend to take forward. These include:

Use of peat-free compost; Rainwater harvesting; Planting of native trees; Creation of a wildflower meadow; Installation of a bat box; Installation of a hedgehog house; Installation of a bird box; Installation of a bee brick; and Creation of a log pile for invertebrates, reptiles and amphibians.

- 43. These enhancements would be proportionate to the scale of the development and would contribute to criterion A, B and F of policy SD2.
- 44. Furthermore, criterion E and I will be met through the sustainable construction and design measures set out in paragraphs 37-39 above.
- 45. The pre-application advice issued in October 2023 confirms that the site lies within a 'Red Zone' for Great Crested Newts. The application is accompanied by a Great Crested Newt Impact Assessment Report prepared by Imprint Ecology, to understand the impact of the proposals on GCN habitat. The assessment concludes that there are two ponds within 250m of the site. One pond is on the opposite side of the B2116 within the grounds of a primary school surrounded by hardstanding. Another pond lies 12m away, and a Habitat Suitability Index calculation scored this pond scored with "below average" suitability to support GCN, particularly due to the presence of fish, high shading, and its small size.
- 46. Overall, the proposals are considered to have a negligible impact upon GCN and no further surveys are recommended. Precautionary mitigation measures have been presented in the impact assessment. These have been recommended to safeguard any GCN or other small animals that may cross the site by chance.
- 47. The proposals will require the removal of a total of 6 individual trees and a small section of a single hedge. Of these all are category 'C' apart from White Willow T9 and Box Elder T18, which are category 'B' trees. The White Willow (T9) is 11.5m in height, and the Box Elder (T18) is 6m in height, both are too close to the proposed footprint of the dwelling to be retained. Mitigation tree planting is indicated on the tree protection plan to include a Field Maple, a Walnut and a Mountain Ash. Following implementation of a high-quality landscaping scheme, as the new planting establishes it will progressively make a positive contribution to the tree age and species diversity, the extent of canopy cover and the amenity of the locality.

Conclusion

- 48. It has been demonstrated that the proposal represents sustainable development and thus the principle of a replacement dwelling in this location is acceptable as confirmed in the pre-application response.
- 49. The sensitively approached design and site layout ensures that the prevailing character of the area and the natural beauty of the SDNP is retained, whilst providing an innovative and sustainable building that is a visual improvement over the existing property. Existing residents in surrounding buildings will be sufficiently protected from amenity-harm and the proposal includes a number of ecological enhancements to contribute to ecosystems services.

50. For the reasons outlined in this report, the proposal represents sustainable development in compliance with national and local planning policy. The Local Planning Authority is therefore respectfully asked to grant planning permission without delay.

Engagement with the Local Planning Authority

51. This planning statement has been prepared to assist the Local Planning Authority in the determination of the application with regard to national and local planning policy. However, in the event that the Local Planning Authority should wish to discuss any element of the scheme, including potential amendments, the applicants would welcome a discussion prior to the determination of the application. Correspondence can be sent to Whaleback Ltd via the contact details set out below.

Whaleback Planning & Design 91 Boundary Road Hove BN3 7GA

