

Report to: Planning Committee

Date: 30th May 2022

Application No: 220014

Location: Moira House School, Upper Carlisle Road, Eastbourne, BN20 7TE

Proposal: Partial demolition and change of use of vacant private school to C3 (residential) to enable conversion of Moira House, Boston House, and Dunn House to 33 apartments and 2 houses.

Associated excavation to facilitate construction of covered parking area.

Erection of 17 new family houses, along with dedicated parking for houses and associated landscaping, communal amenity space and play space.

Applicant: James Taylor

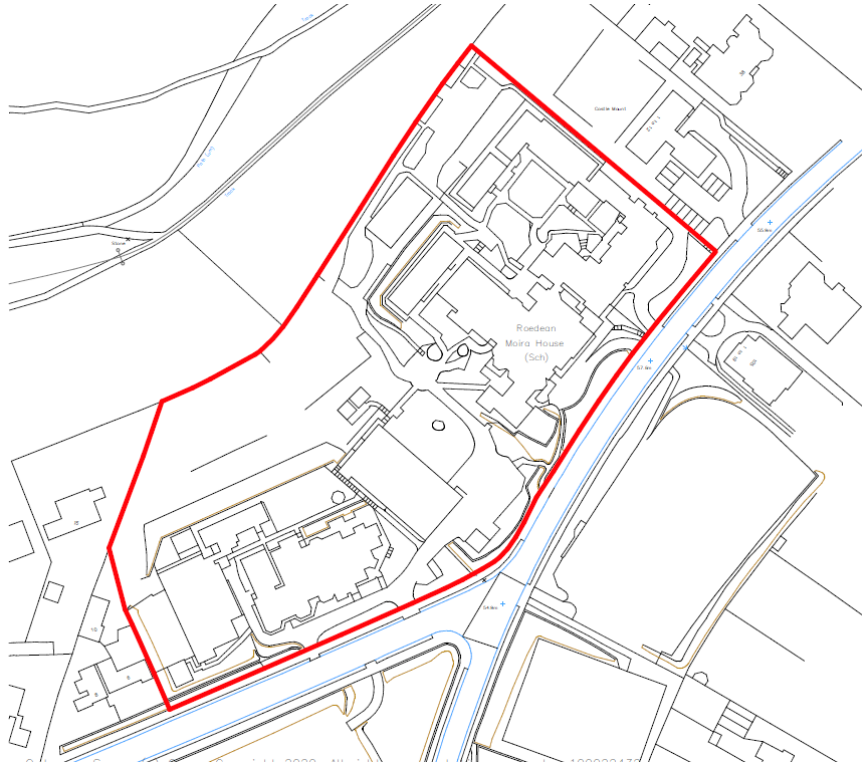
Ward: Meads

Recommendation:

1. Delegate to the Head of Planning to:
 - a) Receive and evaluate the final response from the Council's elected financial viability consultants; and
 - b) Finalise the schedule of conditions.and on the provision that these issues are concluded favourably:
2. Approve with conditions, subject to S106 Agreement to secure:
 - a) Local Labour Agreement
 - b) Alterations to square off the junction of Carlisle Road with Upper Carlisle Road and to include dropped kerbs and tactile paving
 - c) Improvements to pedestrian and bus stop facilities
 - d) Travel Plan and audit fee of £4,500.

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Map Location:



1. Executive Summary

- 1.1 This application is brought to the Planning Committee in line with the Scheme of Delegation as it proposes major development.
- 1.2 The development proposals make use of a currently disused site through partial demolition and redevelopment to provide a fully residential scheme.
- 1.3 Dwellings would be derived from the conversion of retained buildings to create 33 apartments and 2 houses and the construction of a further 17 new-build dwellings, resulting in the creation of 52 high-quality dwellings in a sustainable location.
- 1.4 The scheme comprises highly energy-efficient buildings that are high in design quality and comprises architectural forms and a palette of materials that are sympathetic to the sites' historic setting.
- 1.5 The proposal complies with the Development Plan and is therefore recommended for approval subject to conditions and a S106 Agreement to secure affordable housing, a local labour agreement and public transport/environmental improvements.
- 1.6 The grant of permission is recommended subject to receipt of an independent review of the submitted Financial Viability Assessment, which concludes that this development would be unviable should an affordable housing contribution be sought.
- 1.7 The development incorporates a suitable level of sustainability and ecological/biodiversity mitigation measures.

2. Relevant Planning Policies

2.1 National Planning Policy Framework:

- 2. Achieving sustainable development
- 4. Decision-making
- 5. Delivering a sufficient supply of homes
- 6. Building a strong, competitive economy
- 8. Promoting healthy and safe communities
- 9. Promoting sustainable transport
- 11. Making effective use of land
- 12. Achieving well-designed places
- 14. Meeting the challenge of climate change, flooding, and coastal change.

2.2 Eastbourne Core Strategy Local Plan 2006-2027:

- B1: Spatial Development Strategy and Distribution
- B2: Creating Sustainable Neighbourhoods
- C11: Meads Neighbourhood Policy
- D1: Sustainable Development
- D5: Housing
- D7: Community Sport and Health
- D8: Sustainable Travel
- D9: Natural Environment
- D10: Historic Environment
- D10a: Design.

2.3 Eastbourne Borough Plan 2001-2011:

- NE4: Sustainable Drainage Systems
- NE7: Waste Minimisation Measures in Residential Areas
- NE14: Source Protection Zone
- NE18: Noise
- NE23: Nature Conservation of Other Sites
- NE28: Environmental Amenity
- UHT1: Design of New Development
- UHT2: Height of Buildings
- UHT4: Visual Amenity
- UHT5: Protecting Walls/Landscape Features
- UHT7: Landscaping
- US3: Infrastructure Services for Foul Sewage and Surface Water Disposal
- US4: Flood Protection and Surface Water Disposal
- HO3: Retaining Residential Use
- Policy HO11: Residential Densities
- HO12: Residential Mix
- HO20: Residential Amenity
- TR2: Travel Demands
- TR5: Contributions to the Cycle Network
- TR8: Contributions to the Pedestrian Network
- TR6: Facilities for Cyclists
- TR11: Car Parking

LCF18: Extension of Educational Establishments
LCF21: Retention of Community Facilities.

2.4 Supplementary Planning Documents and other relevant documents:

Sustainable Building Design SPD
Trees and Development SPG
Eastbourne Townscape Guide SPG
Meads Conservation Area Appraisal
Local Employment and Training SPD.

3. Site Description

- 3.1 The application site is substantial, comprising approximately 2.05 hectares of land. It is an established site comprising a complex of buildings and educational facilities, most recently known as Roedean Moira House School.
- 3.2 The site is bounded on its southern sides by Carlisle Road and Upper Carlisle Road, which provide the site with three of its existing accesses, the main site access being on Upper Carlisle Road and therefore giving the site its address. The site's northern boundary is also the Borough Boundary shared with the South Downs National Park, and is Built Up Area Boundary noted within the adopted Policies Map.
- 3.3 On the eastern side, the site adjoins houses fronting Upper Carlisle Road and Hyde Tynings Close. On its western side, the character is different, but still residential, adjoining Castle Mount – a modern 4-storey purpose-built block of flats fronting Carlisle Road.
- 3.4 Given its close proximity to the Downs, the site comprises a sloped topography, which is significantly steep in places. On the southern, street facing boundary the site is elevated above street level, slightly from Upper Carlisle Road and significantly more so from Carlisle Road.
- 3.5 The site is verdant in its appearance, being heavily populated with trees, many of which are self-seeded. There are no Tree Preservation Orders affecting the site although the site is located within the Meads Conservation Area.
- 3.6 The site accommodates a significant degree of built form comprising both buildings and hard surfaces. Existing buildings can be roughly broken down as follows.
- 3.7 Moira House – the original school building built in the late nineteenth century, circa 1975. A five storey building, three of which are within the large roof space and an extension to the original roof. The building has been extended on its eastern, western and northern sides by more modern additions.
- 3.8 Dunn House – constructed prior to the end of the nineteenth century, located at the southern corner of the site fronting Carlisle Road. This building has also been extended to the rear with modern additions.

- 3.9 Boston House – also constructed prior to the end of the nineteenth century. The largest of the original school buildings, comprising six storeys including its tower – a distinctive feature of the building.
- 3.10 Gymnasium and swimming pool buildings – two separate buildings located either side of Boston House, housing indoor sporting facilities in relation to the former school activities. The site also has a number of smaller ancillary buildings and a significant degree of hard landscaping to facilitate its former use as a school.
- 3.11 In terms of heritage assets, the site does not comprise any statutorily or locally listed buildings. The site is not located within an Archaeological Notification Area. However, the site is located within the Meads Conservation Area.

4. **Relevant Planning History**

- 4.1 Extensive planning history connected with its former use as an education facility.

5. **Proposed Development**

- 5.1 The application seeks permission for the demolition of the majority of the existing built form on the site. Three buildings would be retained: Moira House, Boston House and Dunn House. All other built form on the site, including a gymnasium, swimming complex, various ancillary buildings/structures and hard landscaping would be demolished.
- 5.2 This application seeks planning permission for: “Partial demolition and change of use of vacant private school to C3 (residential) to enable conversion of Moira House, Boston House and Dunn House to 33 apartments and 2 houses with associated excavation to facilitate construction of covered parking area. Erection of 17 new family houses, along with dedicated parking for houses and associated landscaping, communal amenity space and playspace.”
- 5.3 The proposed scheme will retain the three principal buildings on the site, along with the existing ‘cottage’ to the rear of Dunn House, but will demolish most of the later extensions to these buildings and the more recent classrooms, storerooms, gymnasium and swimming pool buildings.
- 5.4 Boston House will be converted to 22 apartments.
- 5.5 Moira House will see its side and rear extensions demolished and will then be converted to 8 apartments.
- 5.6 Dunn House will be converted to 3 apartments and 1 house.
- 5.7 The ‘Cottage’ to the rear of Dunn House will be renovated into a 3 bed home.
- 5.8 Across the rest of the site 17 new build family homes are proposed.
- 5.9 Parking for most of the apartments is within a single covered park at the rear of the site.

- 5.10 New pedestrian footpaths and internal vehicular accesses are proposed throughout the site.
- 5.11 A children's play area is provided.
- 5.12 A detailed landscaping strategy retains the best quality trees and proposes extensive additional planting and provides for generous gardens to houses and communal amenity areas with the site.

6. Consultations

6.1 Specialist Advisor (Arboriculture)

- 6.1.1 The Specialist Advisor (Arboriculture) has been involved in this application prior to submission and has not raised any objection following consultation on the submitted scheme.

6.2 Specialist Advisor (Conservation)

- 6.2.1 Supportive of the proposals from a heritage perspective.

6.3 Specialist Advisor (Regeneration)

- 6.3.1 The Local Employment and Training Supplementary Planning Document (SPD), adopted November 2016, confirms this planning application qualifies for a local labour agreement as it meets the threshold for a residential development.

- 6.3.2 In the event of the planning application being approved, Regeneration requests it be subject to a local labour agreement in accordance with the SPD.

6.4 Specialist Advisor (Planning Policy)

- 6.4.1 No objection in principle to the loss of the education facility and the development of the site for residential purposes.

- 6.4.2 Raises concerns regarding the density of the site and making full and efficient use of the land for the purposes of delivering housing to meet demand.

- 6.4.3 Raises concerns regarding the lack of affordable housing provision, particularly in the absence of other scheme that may be able to yield a contribution.

6.5 Natural England

- 6.5.1 Natural England has confirmed that there is no objection on grounds of the potential impact of the proposed development upon protected habitats and species off-site.

6.6 ESCC Highways

- 6.6.1 Responding to initial consultation, the Highways Officer had concerns with regard to the access arrangements for the site in terms of both safety and manoeuvrability. Following the submission of additional and revised information, the Highways Officer has no further concerns.

6.6.2 Conditions and heads of terms for S106 legal agreement are recommended.

6.7 Lead Local Flood Authority

6.7.1 ESCC at Lead Local Flood Authority and the Pevensey and Cuckmere Water Level Management Board has liaised with the applicant's elected engineers throughout the application process on issues of drainage and water management on the site, including the potential for flooding on and off-site.

6.7.2 At the time of writing, the LLA has removed their original objection following further soakaway testing during the application period, but has recommended conditions requiring further testing and any revised scheme that would be required to take account of the results of that testing.

6.8 County Archaeologist

6.8.1 No objection subject to the imposition of conditions requiring submission of a programme of archaeological works in accordance with a written scheme of investigation and an archaeological site investigation and post-investigation assessment.

6.9 Conservation Area Advisory Group

6.9.1 The Conservation Area Advisory Group were strongly supportive of the application on heritage grounds, noting that the development would enhance the character and appearance of the conservation area through the retention and reuse of the original school buildings and the replacement of those that do not contribute positively, together with the sympathetic design and appearance of the proposed new buildings.

6.10 County Ecologist

6.10.1 No objection has been received from the County Ecologist.

7. Neighbour Representations

7.1 Statutory notification of this application has been undertaken in the form of neighbour notification letters, site notices displayed in roads neighbouring the site and a press advert in a locally distributed newspaper.

7.2 The Meads Community Association is actively supportive of the above application, particularly of the retention of the the existing original buildings.

7.3 The Eastbourne Society supports the scheme.

7.4 One representation has been received by a party acting on behalf of an objector, the name and address of whom are unstated. For this reason, the representation carries limited weight. The representation raises objection on grounds of the marketing of the previous educational use on the open market.

8. Appraisal

8.1 Loss of education/community facilities

- 8.1.1 Community facilities, including educational, are subject to a level of protection under both local planning policy (Borough Plan Policy LCF21 and Core Strategy Policy D7) and the National Planning Policy Framework (at para. 92).
- 8.1.2 Core Strategy Policy D7 states that the loss of community, sports or health facilities will be '*resisted unless it can be demonstrated that the facility is no longer required to meet current needs*'. Community facilities include educational establishments.
- 8.1.3 The applicant has submitted a Marketing Statement in support of the application. This outlines the trajectory of the site with regard to mounting viability issues towards the end of its former educational use. The school was part of the larger Roedean Group of Schools, however it suffered material operational losses for the financial year ending 2019.
- 8.1.4 The statement goes on to describe how ongoing educational use was pursued and outlines the marketing endeavours that were undertaken to find a purchaser for Moira House as a going concern. The efforts were not without a degree of interest and the application outlines that a number of leads were followed, including in depth discussions with a prospective purchaser. However, the prospective operator subsequently withdrew from the purchase, citing concerns about long-term viability.
- 8.1.5 Further support for the justification for loss of the educational use is provided in the form of an Educational Needs Assessment (ENA). This explores the reasons behind the closure of the school and the current demand for educational places in Eastbourne in the short to medium term. The assessment, prepared by EFM, finds that the closure of the school is based on economic difficulties and its falling pupil roll across the last five years strongly indicates that demand for independent schooling within Eastbourne has fallen. In addition, the existing local schools, both prep schools and senior schools, are listed as having surplus places available should the demand start to rise.
- 8.1.6 In addition to this, the ENA considers other community uses falling within the same Use Class F. It identifies that Eastbourne is well served by museums, libraries, places of worship and meeting halls. The one shortfall noted is that of magistrates or law courts. However, given the closure of the magistrate's court at Orchard Road, within the more sustainable Town Centre, it is unlikely that the Ministry of Justice would consider locating a law court on the application site, particularly given the site's complexities and arrangement.
- 8.1.7 It is considered that the loss of the private school would have limited impact on the sustainability of the neighbourhood and in

light of the lack of housing land supply, it is unlikely that a refusal of the application on the principle of the loss of the existing use could be substantiated.

8.2 Residential use

- 8.2.1 At the heart of the NPPF is the presumption in favour of sustainable development which flows through both plan-making and decision-making.
- 8.2.2 The Revised National Planning Policy Framework (NPPF) directs Local Planning Authorities to adopt a presumption in favour of sustainable development. One of the three overarching objectives that form the components of sustainable development is a social objective (para. 8 b). The social objective requires the support of '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 a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.'
- 8.2.3 Section 5 of the NPPF seeks to boost the supply of homes. The benefit of 52 new homes weighs positively in the schemes favour when considered against all other material considerations.
- 8.2.4 The National Planning Policy Framework (NPPF) requires local planning authorities to identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of housing. As of October 2019, Eastbourne is only able to demonstrate a 1.8-year supply of housing land, meaning that Eastbourne cannot demonstrate a five-year housing land supply.
- 8.2.5 National policy and case law have shown that the demonstration of a five-year supply is a key material consideration when determining housing applications. It also states that where relevant policies are out-of-date, permission should be granted "unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole", (NPPF, paragraph 11).
- 8.2.6 Para. 120 of the NPPF maintains that substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs. Development of under-utilised land and buildings should be promoted and supported, especially where this would help to meet identified needs for housing. This national policy position is mirrored by the Eastbourne Core Strategy 2013, which states that *'in accordance with principles for sustainable development, it will give priority to previously developed sites with a minimum of 70% of Eastbourne's housing provision to be provided on brownfield land'*. Although parts of the application site are heavily populated by trees, this site is defined as a brownfield site.

- 8.2.7 The 'Meads Vision', as defined by Eastbourne's Core Strategy states that 'Meads will strengthen its position as one of the most sustainable neighbourhoods in the town. It will make an important contribution to the delivery of housing and increasing its importance to the tourism industry, whilst conserving and enhancing its heritage and historic areas'.
- 8.2.8 Borough Plan saved Policy HO2 identifies this location as being predominantly residential and supports sustainable residential development. It would also be considered a windfall site, as it has not previously been identified in the Council's Strategic Housing Land Availability Assessment (SHLAA). The application will result in a net gain of 52 residential units and the Council relies on windfall sites as part of its Spatial Development Strategy according to Core Strategy Policy B1.
- 8.2.9 The development would contribute a net gain of 52 residential dwellings towards the Council's housing targets and this would be delivered in a Predominantly Residential Area and one of the two most sustainable neighbourhoods in the Borough, in line with the Meads Vision. Taking account of the above considerations, the principle of the proposed residential use of the site is considered to be acceptable.

8.3 Density

- 8.3.1 Para. 125 of the Revised NPPF encourages the efficient and sustainable use of sites for housing development, stating 'where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.
- 8.3.2 Given the constraints of Eastbourne, there is very limited land available for development. This adds weight to the consideration of density for the purposes of housing delivery. It is vital that every sustainable site that becomes available is maximised.
- 8.3.3 Paragraph 124 of the National Planning Policy Framework 2021 states planning decisions should support development that makes efficient use of land, taking into account certain criteria including, the identified need for different types of housing and other forms of development and the availability of land suitable for accommodating it; and the desirability of maintaining an area's prevailing character and setting.
- 8.3.4 Policy B1 of the Core Strategy states that Meads is one of six sustainable neighbourhoods where higher residential densities will be accepted than the existing density range, which is 13-127 dwellings per hectare.
- 8.3.5 The site's location on the periphery of the built-up area, directly adjacent to the protected South Downs National Park, coupled with the verdant and semi-rural character of the site itself, are reasons

why higher densities may not be possible on this site. Higher densities would lead to greater proportions of built form, whether through additional dwellings or required car parking and associated access surfacing. The 25 dwellings per hectare density of the proposed scheme protects the character of the site and is acceptable in policy terms.

8.4 Housing Mix

- 8.4.1 The proposal would create a total of 52 dwellings of different types, sizes and arrangements, comprising a mix of flatted, semi-detached and detached housing, ranging from 1-bedroom flats to 7-bedroom houses.
- 8.4.2 Retained buildings would be converted to provide 33 apartments and 2 houses and 17 new-build houses would be constructed, where possible, on previously developed land within the site.
- 8.4.3 A summary of the breakdown of the retained buildings is as follows: Moira House would be converted to provide a total of 8 apartments; Dunn House would be converted to 1 house and 3 apartments with part of the building separated to provide a detached cottage; and Boston House would be converted to provide 22 apartments; a total of 33 apartments and 2 houses.
- 8.4.4 Turning to the new build dwellings, the scheme provides a mix of 3-5 bed dwellings in a variety of styles.
- 8.4.5 The Eastbourne Strategic Housing Market Assessment 2017 states that the key dwelling types particularly required across Eastbourne are 1 and 2 bed flats and 3- and 4-bedroom houses, although there is an identified need for other dwelling types.
- 8.4.6 Table ES1 of the SHMA indicates the overall mix of future housing required for the period 2015-2035; three bed housing should make up 31.7%. one- and two-bedroom flats are required at 16.9% and 11.1% respectively. Four plus bedroom housing is 11.4%.
- 8.4.7 The proposed housing mix generally reflects the housing need identified within table 1 of the SHMA and is acceptable in policy terms.

8.5 Impact of the proposed development on amenity of adjoining occupiers and the surrounding area:

- 8.5.1 Existing neighbouring residents flank the site on its north-eastern and southwestern sides. Castle Mount, a modern purposed-built block of flats adjoins the north-eastern side fronting Carlisle Road, whilst 6 Upper Carlisle Road and 13 Hyde Tynings Close adjoin the southwestern boundary.
- 8.5.2 There is a degree of existing overlooking between Castle Mount and Dunn House, whilst mature trees provide screening when in leaf. This arrangement would be relatively unchanged, although suitable separation distances exist to protect residential amenity.

- 8.5.3 On the south western side, 6 Upper Carlisle Road is separated from existing buildings on the site and provide outlooks to front, onto Upper Carlisle Road, and to the rear. This arrangement would be mirrored by the proposed plots 1 and 2, which would form a continued building line fronting Upper Carlisle Road. The relationship would be closer, but House Type A, which would sit on plot 1, would not provide any elevated windows facing 6 Upper Carlisle Road, such that the amenity of its occupants would be protected. Plot 1 would not be overbearing upon the near neighbours.
- 8.5.4 There would be sufficient separation distances and tree cover between 13 Hyde Tynings Close and plots 1 and 2 to prevent overlooking.
- 8.5.5 A Daylight Assessment has been submitted to demonstrate that the proposed development would not have adverse impacts on current daylight levels for neighbouring property.
- 8.5.6 A Construction Management Plan has been submitted with the application, which would minimise the impact upon neighbouring occupants from construction related disturbance and nuisance, including traffic management, hours of working and environmental practices to reduce pollution.

8.6 Affordable Housing

- 8.6.1 As the development would result in a net increase of over 10 dwellings, policy D5 of the Core Strategy 2013 and accompanying Affordable Housing SPD (2017), requires the provision of affordable housing. The Meads neighbourhood is identified as a 'high-value' market neighbourhood and, as such, the ratio of affordable housing required would be 40% of the overall development. The tenure mix should be 70% rented, 30% Shared Ownership.
- 8.6.2 In relation to the submitted scheme, this would amount to 20.8 units; 20 units provided on-site, with the remaining provision forming an off-site financial contribution, in accordance with Affordable Housing SPD and this would be secured by a Section 106.
- 8.6.3 Supporting paragraph 4.5.5 of policy D5 takes into consideration development viability, stating that "affordable housing requirement will be in a flexible way on a site by site basis taking into consideration other planning considerations that may affect delivery."
- 8.6.4 The applicant has submitted an Affordable Housing Statement and Financial Viability Assessment (FVA) in line with the requirements of Core Strategy Policy D5 and the Affordable Housing SPD. The FVA concludes that the scheme is unable to provide affordable housing due to a number of factors, including the high cost of retaining and refurbishing the existing buildings and the high cost of good quality materials required to complement the Conservation

Area; the achievement of net zero carbon across much of the site; and the upper limit on sales values that can be achieved.

- 8.6.5 At the time of writing, the submitted FVA is being independently reviewed by the Council's elected viability consultants, the results of which will be updated in due course.
- 8.6.6 The recommendation at the time of writing assumes that the information provided is acceptable to the Council's consultants, but should the independent review indicate affordable housing can be provided, the maximum amount possible would be secured through the use of a Section 106 legal agreement. Members will be updated on these matters at the Committee meeting and advised regarding any change to the recommendation resulting from the outcome of the review.

8.7 Quality of Proposed Accommodation

- 8.7.1 The proposed dwellings would generally provide an exceptional standard of accommodation, being spacious, well arranged on plan and with good outlook for future occupants. The majority exceed floor space standards, although a portion of the units are tighter to adopted floor space standards, which are intended to provide more affordable, starter or downsizing accommodation.
- 8.7.2 The 'Technical housing standards - nationally described space standards', adopted by central Government in March 2015 defines the requirements for internal space standard for new residential units, including both the Gross Internal Area (GIA) of each unit and the internal floor area of individual rooms and storage space. Each of the proposed dwellings would meet the minimum internal space standards in terms of the total Gross Internal Area and individual bedroom sizes required by the standards.
- 8.7.3 All bedrooms and primary amenity areas within the proposed building have access to clear glazed windows with a good level of outlook and exposure to natural light and effective natural ventilation.
- 8.7.4 The units are well arranged on plan, providing clear useable space for the intended use of each room, avoiding awkwardly shaped rooms where possible. Floors within the retained buildings would be served by lifts and the size and arrangement of many of the units would offer flexibility for wheelchair use.
- 8.7.5 It is not considered that there would be any privacy issues for future residents. Buildings would retain sufficient separation distances to provide suitable levels of privacy for future residents.
- 8.7.6 The application is supplemented by a Daylight Assessment, which assessed the proposed accommodation. The report confirms that all rooms pass the Room Depth Criteria (RDC) Test and 92% of the rooms comply with the average Daylight Factor (ADF) test. It also recognises the site constraints in arriving at this result, noting that the site is sloping, and a significant proportion of the units are

apartments formed from the refurbished school buildings. The overall ADF pass rate increases to 95% when marginal rooms are included.

- 8.7.7 The application is supported by a Noise Assessment for the development, based upon a measured noise survey for the site. The assessment proposes mitigation in the form of secondary glazing for retained buildings and high- performance glazing for new dwellings, as well as sound minimisation measures during the course of construction. The assessment demonstrates that, provided the mitigation measures considered in the report are implemented, noise levels within the proposed properties and in the gardens would meet the noise level criteria specified in adopted guidance.
- 8.7.8 In terms of amenity space, units would benefit from private outdoor amenity space, whether garden or balcony space. Residents would also have access to a communal amenity space located above the multistorey car park. This would be intended to provide quality landscaped environment, which would be planted to provide a sensory experience for users. Play space would be provided within this communal area for safe play within view of units within the scheme.

8.8 Design and Heritage

8.8.1 Section 12 of the NPPF is concerned about development 'achieving well-designed places' and under paragraph 127 it states, amongst other requirements, that 'planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.
- b) are visually attractive as a result of good architecture, layout, and appropriate and effective landscaping.
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities) [...]
- f) ...create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'

8.8.2 The site is located within the Meads Conservation Area. The Meads Conservation Area Appraisal notes that the site is located within Character Area 4. With regard to the application site and its buildings, the Appraisal notes that Moira House, Dunn House Boston House are Positive Contribution Buildings.

- 8.8.3 The scheme recognises the value of the original school buildings through their retention and adaptation, repurposing them for ongoing contribution to the character and appearance of the conservation area. Conversely, the later additions, many of which are utilitarian in their nature and appearance, are proposed for removal. This would not only bring about a reversal of the degradation that the additions have had upon the retained original buildings, per se, but would also remove their negative impact upon the street scenes of Carlisle and Upper Carlisle Roads.
- 8.8.4 Turning to the proposed redevelopment scheme, existing retained buildings would be renovated. Moira House and Dunn House have lost their original windows and the proposed replacements, although UPVc would bring about an improvement to the character and continuity of the fenestration. Boston House windows would be retained, retrofitted with double glazing where possible and otherwise secondary glazed.
- 8.8.5 The proposed new build dwellings provide a varied typology but a common architectural style that reflects the retained school buildings and Meads Conservation Area. The proposed new build dwellings adopt a traditional appearance to reflect the traditional appearance of retained and neighbouring stock. They comprise three main house types, together with a cottage, a gate house and bespoke housing reflecting the agricultural vernacular of rural agricultural buildings, given the close proximity of the site to the SDNP.
- 8.8.6 The new build dwellings comprise a varied palette of materials, which would provide variety and interest throughout the development, whilst retaining visual cohesiveness between new and historic built form. The palette of materials comprises predominantly traditional materials, including bricks, clay tiles that and stonework to reflect the surrounding vernacular.
- 8.8.7 The proposed scheme is very high quality and visually attractive, whilst being sensitive to its historic setting and is therefore acceptable on design grounds.

8.9 Highways and Parking

- 8.9.1 The site is located to the west of the Town Centre in the Meads area and is within a reasonable walking distance of a number of trip attractors including the town centre, rail station (both approximately 1.1km) and there are also local shops and services available on Meads Street (approximately 400m). The closest bus stops are available on Carlisle Road and Gaudick Road within providing routes 3 and 4 which link to the Town Centre.
- 8.9.2 Appendix 1 to the Transport Assessment provides an analysis of the current environment for pedestrians and public transport users in the vicinity of the site. The report states 'the non-motorised users NMU (audit) confirms that facilities for non-motorised users are provided to a high standard in the vicinity of the site'; although there

are footways serving the site there are limited dropped kerbs and tactile paving on the routes towards the town centre, local shops and bus stops which restrict accessibility for those with mobility impairments. In order to improve the local facilities and in support of the Local Cycling and Walking Infrastructure Plan objectives and ESCC Bus Service Improvement Plan, the Highways Officer has requested that the following improvements be secured:-

- 8.9.3 Dropped kerbs and tactile paving at the junction of the Upper Carlisle Road at its junction with Carlisle Road.
- 8.9.4 Dropped kerbs and tactile paving at the junction of Link Road with Carlisle Road.
- 8.9.5 Dropped kerbs and tactile paving at the junction of Paradise Drive with Carlisle Road.
- 8.9.6 Dropped kerbs and tactile paving at the junction of Salisbury Road with Carlisle Road.
- 8.9.7 Dropped kerbs on Carlisle Road between the junction with Salisbury Road and the Beachy Head Road/Darley Road junction (at an appropriate location) to enable safe crossing point from the western to eastern side of the road (there is no footway on the western side of Carlisle Road approaching the Beachy Head Road/Darley Road junction and limited landing space for pedestrians on the southern side).
- 8.9.8 Dropped kerbs and tactile paving on the eastern side of the Beachy Head Road/Darley Road/Carlisle Road junction.
- 8.9.9 The site has 4 existing vehicular access points - 2 accesses fronting Boston House on Upper Carlisle Road and 2 accesses from Carlisle Road: 1 for Dunn House and 1 for Moira House.
- 8.9.10 The main access into the site is adjacent to Boston House and this is proposed for retention and enlargement to a width of 5.5m, together with alterations to the existing radii to accommodate a 12m refuse vehicle. Safety concerns were raised by the Highways Officer in respect of this access and a Road Safety Audit was undertaken during the course of the application, concluding that there was some risk of side impact collisions at the access and the lack of proposed pedestrian facilities could compromise pedestrian safety.
- 8.9.11 The Audit recommended that the junction be squared off with a traffic island or pedestrian refuge to control traffic movements. However, following a swept path analysis, it has been determined that an island would not allow suitable movement for larger vehicles through the junction, as such the auditor has accepted that the junction should be squared off to slow drivers and assist pedestrian movement. The alignment and detail of the tactile paving can be addressed at the S278 stage. The applicant has agreed to junction alterations.

- 8.9.12 The Audit also recommended that dropped kerbing and tactile paving be provided across the main access and this has been agreed. These highway works would be secured through S106 Agreement.
- 8.9.13 A 2m footway on the west side of the access will connect from the existing pedestrian facilities on Upper Carlisle Road to Plot 4, the footway then continues on the southern side of the access road with shared surface provided from plot 6. The access road will have an average gradient of 1 in 12, although a slope of 1 in 20 for pedestrians is preferred, 1 in 12 is the maximum accepted. This is therefore considered to be appropriate for a development of this type.
- 8.9.14 The western access to the front of Boston House will also be retained and widened to provide access to plots 1 & 2. The access is 5m in width to allow two-way flows and an area of the existing hard standing at the front of Boston House will provide a turning area for delivery and emergency vehicles.
- 8.9.15 The application proposes removal of the existing access currently serving Moira House. A replacement access would serve Dunn House and a newly marked out parking area. The Highways Officer raised concerns following consultation about the alignment and width of the proposed access which would not allow suitable positioning, sightlines, or two-way movements. An amended plan was submitted in response to this concern and has been agreed. The revised access will have a width of 5m and be perpendicular to Carlisle Road which will allow suitable driver positioning for safety and manoeuvrability.
- 8.9.16 The stretch of Carlisle Road and Upper Carlisle Road serving the site is subject to a 30mph speed limit and the visibility splay requirements are 2.4m x 43m in each direction. Although it is noted that there are trees located within the highway to the west of the main access, it is considered that these will not impact on the available visibility at 2.4m setback distance.
- 8.9.17 The Transport Statement has included analysis of the trip rates for both the former educational use and the proposed residential using data from the national TRICS database. This concludes that the proposed development would result in fewer trips when compared to the former use, or alternative use as a state school and the Highways Officer has no concerns regarding the proposal from a capacity perspective.
- 8.9.18 A total of 87 parking spaces would be provided as part of the scheme, comprising 41 on-plot spaces and 46 car park spaces (87) plus an additional 14 garage spaces.
- 8.9.19 Based upon the East Sussex Residential Parking Demand Calculator, the scheme generates a parking demand of 95 spaces (if 2 spaces are allocated per house and per 3-bedroom apartment)

and 83 required (if 1 space allocated per apartment and 2 per house).

- 8.9.20 The Transport Statement and submitted plan (Drawing No. 700/2002/Q) indicates that 87 spaces will be provided across the site (5 provided for Dunn House, 46 within the multi storey parking area and 36 on plot spaces with an additional 11 garages for 11 of the houses). The Highways Officer has confirmed that that garages only count as 1/3rd of a space, and on this basis the applicant has not included these spaces within the total.
- 8.9.21 Following some concerns regarding the layout of the multistorey car park - some of the spaces fell short of the recommended dimensions (3m x 5m) where adjacent to walls – amended plans were received to address this concern.
- 8.9.22 The Council's policy TR2 (Travel Demands) seeks a balance between public transport, cycling and walking to meet the transport demands of proposed development. The proposed plans indicate that cycle storage would be provided within the rear gardens of each of the proposed dwellings. The amount, quality and location of the provision is considered to meet the requirements of adopted policy.
- 8.9.23 The proposed swept path plans within the Transport Statement demonstrates appropriate and safe access for a 12m refuse vehicle. The proposed bin strategy plan shows that refuse collection points are located within 25m of the access to plots 1 and 2 as such meet the requirements set out in good practice refuse and recycling collection guidelines. It would be preferable to locate the bin store for Boston House nearer to the site; however, as this is within suitable carry distances for residents this is not considered a major issue.
- 8.9.24 The applicant has submitted a Travel Plan Statement which gives general details of the plan objectives but has stipulated that a more detailed Travel Plan will be produced following any permission granted. The detailed Travel Plan would be required to set out ways to reduce the number of car journeys to and from the site and encourage the use of sustainable transport. This would be secured by legal agreement, together with an Audit Fee of £4500 to cover the cost of managing the Travel Plan.
- 8.9.25 Cycle parking spaces would also be provided as a means to encourage access to the site by bicycle. Single family dwellings would have private facilities and communal facilities would be provided for the flatted units. 22 cycle spaces would be located within the multistorey car park and this is sufficient quantum of spaces for the 33 flats on site. However, the Highways officer has raised concerns with regard to the location of these facilities from Moira and Dunn House. As such a condition has been attached requiring details of revised/additional parking spaces for these residents closer to where they would live.

8.9.26 Taking account of the above considerations the transport impacts of the development are considered to be acceptable subject to the imposition of conditions.

8.10 Ecology

8.10.1 The application is supported by a Phase 1 Ecology Survey (undertaken on 19th April 2021). The Phase 1 survey evaluates the potential for protected species to occur within the site and provide appropriate recommendations for further surveys and mitigation where required. A full Ecological Impact Assessment was then undertaken following reptile and bat surveys using this baseline data.

8.10.2 The results of the subsequent phase 2 protected species surveys concluded a low population of slow worms and 1no. adder sited within the western edge of the site and 3no. day roosts, each with 1no. common pipistrelle bat, using 2no. of the buildings (Dunn and Boston - both retained) therefore a Natural England Bat Licence is required ahead of the proposed refurbishments.

8.10.3 The application proposes avoidance and mitigation measures to prevent any contravention of the relevant legislation with regards protected species, including compensation and enhancement measures such as native species planting along the boundaries of the site, off-site reptile translocation and installation of bird and bat boxes are to be included into the scheme. These elements would be secure by condition.

8.10.4 Given the proximity to the SDNP, the impact of lighting has been considered. The application proposes a lighting strategy, which considers the SDNPA specific policies on lighting and dark skies for development in and surrounding the National Park, in accordance with Core Strategy Policy NE13 'Pollution Mitigation Measures'. In addition, the lighting scheme would also conform to recommendations within BS 5489-1:2013 and Secure by Design guidance.

8.11 Landscaping, Trees and Biodiversity

8.11.1 Turning to the landscape proposals for the site, the scheme aims to protect as much of the existing good quality soft landscaped features as possible, whilst adding to biodiversity, protecting ecology, and facilitating pedestrian friendly environments. The scheme also aims to encourage the prospective residents to spend more time outdoors with the goal fostering a community through green shared social spaces.

8.11.2 The scheme retains existing vegetation on the steeper banks within the site and supplements with new native ground cover planting to further enhance its biodiversity interest, and to provide privacy and screening features. All mature and healthy trees/tree groups will be retained within the site and along the boundaries. Natural landscaping will be enhanced across the site through native

planting, which will soften the views within the site and from the neighbouring area.

- 8.11.3 An extensive replanting scheme is proposed, comprising a variety of landscape features including trees, shrub groups, ornamental planting and hedgerows will provide an enhanced range of wildlife habitats and a beneficial impact on the biodiversity of the site. The submitted tree planting plan (1634-L90-300A) has been produced in liaison with the arboricultural consultant and Landscape Architect to provide suitable species, as mitigation for those lost.
- 8.11.4 A communal amenity space would be provided above the multistorey car park to the rear of Boston House and would be provided for the residents and their visitors. The area will incorporate a natural play area, a meadow grassland and wildlife beneficial planting throughout including bug hotels positioned within a nature walk, all connected by a series of resin bound footpaths, with two timber pergola structures providing vertical interest, and formal and informal seating areas and sculptural elements incorporated into the park all set within a contemporary but English country garden theme.

8.12 Sustainability

- 8.12.1 The applicant has submitted an Energy Strategy, which sets out the proposed 'Be Lean', 'Be Clean', 'Be Green' approach for both the retained buildings and the new build elements, which includes a fabric first approach to make the buildings as efficient as possible and the specification of renewable energy generation in the form of Air Source Heat Pumps and PV photovoltaic panels as the principal energy sources. This will achieve a carbon reduction of 62% for the refurbished buildings through the use of renewable energy and will achieve a total carbon reduction of 35%. The new build elements of the scheme will achieve a total 94% reduction in carbon emissions of the new build properties. In addition, these properties will achieve the target of being a Net Zero Carbon development.
- 8.12.2 The application does not outline whether electric vehicle charging would be made available, but it is considered that this could be required for condition to meet the Council's adopted guidance.

8.13 Drainage and Flood Risk

- 8.13.1 Section 14 of the NPPF is concerned about 'meeting the challenge of climate change, flooding and coastal change'.
- 8.13.2 The applicant has submitted detailed scheme for consideration and proposes to infiltrate water at the site due to the high levels of chalk composition in the geology of the site. This was met with an objection from ESCC as Lead Local Flood Authority following consultation, who asked for further testing to be undertaken on the capability of the site to infiltrate water over the lifetime of the development.

- 8.13.3 Further testing was undertaken by the applicant's engineers during the application period. However, the LLA remain concerned that the use of soakaways in chalk can potentially result in the formation or worsening of dissolution features which can lead to ground stability issues.
- 8.13.4 As such, the LLA has request that any proposals to use infiltration are supported by a Geotechnical Assessment carried out at the detailed design stage. Soakaways would be required to be located an appropriate distance from structures and foundations, as informed by the Geotechnical Assessment.
- 8.13.5 Further to this, due to the location of the site in a Source Protection Zone, details of infiltration will require agreement with the Environment Agency.
- 8.13.6 The LLA has dropped its original objection, subject to the imposition of conditions.

9. **Human Rights Implications**

- 9.1 The impacts of the proposal have been assessed as part of the application process. Consultation with the community has been undertaken and the impact on local people is set out above. The human rights considerations have been taken into account fully in balancing the planning issues; and furthermore the proposals will not result in any breach of the Equalities Act 2010.

10. **Recommendation**

10.1 Delegate to the Head of Planning to:

- Receive and evaluate the final response from the Council's elected financial viability consultants;
- Finalise the schedule of conditions

and on the provision that these issues are concluded favourably:-

10.2 Approve with conditions, subject to S106 Agreement to secure:

- a) Local Labour Agreement;
- b) Alterations to square off the junction of Carlisle Road with Upper Carlisle Road and to include dropped kerbs and tactile paving
- c) Improvements to pedestrian and bus stop facilities;
- d) Travel Plan and audit fee of £4,500.

11. **Appeal**

- 11.1 Should the applicant appeal the decision the appropriate course of action to be followed, taking into account the criteria set by the Planning Inspectorate, is considered to be written representations.

12. **Background Papers**

12.1 None.