



Hastings Local Plan

Potential Impact of Development on Combe Haven & Marline Valley Woods SSSI

Produced for Hastings Borough Council

By Applied Ecology Ltd

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Signed on behalf of Applied Ecology Ltd:

Director

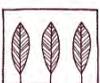
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1 Introduction

Background

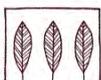
- 1.1 Applied Ecology Ltd was commissioned by Hastings Borough Council to review the potential impacts of developing four sites allocated for development in the Hastings Development Management Plan (Revised Proposed Submission Version 2014) on the ecological integrity of nearby Sites of Special Scientific Interest (SSSI) called Combe Haven SSSI and Marline Valley Woods SSSI.
- 1.2 The four sites have references of:
 - FB1 – The Grove School
 - FB2 – Former West St Leonards Primary School
 - LRA6 – Queensway North, Queensway
 - LRA9 – Marline Fields, Enviro21 Business Park, Land West of Queensway
- 1.3 The location of the four sites in relation to Combe Haven and Marline Valley Woods SSSI is shown by **Figure 1.1** and **1.2** respectively.
- 1.4 Consultation responses to aspects of the Local Plan that have driven the need for this assessment report are provided in **Appendix 1** for reference.

FB1 - The Grove School

- 1.5 Site FB1 (The Grove School) is a 9.40 ha former secondary school that is located 218m at its closest point to the Combe Valley SSSI that has been identified in the local plan as having the potential to be re-developed as a residential site with a possible net capacity of 240 new units.
- 1.6 A planning application for development on the site is expected to be made at some point in 2014, and it is expected that this will take full and proper account of potential ecological impacts of development on ecological receptors including the Combe Haven SSSI.
- 1.7 In the meantime, a strategic overview of the potential impact of the proposed development on the SSSI is provided in **Chapter 2** of this report.

FB2 - Former West St Leonards Primary School

- 1.8 Site FB2 (Former West St Leonards Primary School) is a 3.92 ha land area identified for mixed use development (residential and community) that has a possible net capacity of 100 housing units. FB2 is located 595m to the southeast of the Combe Valley SSSI at its closest point.
- 1.9 A planning application for development on the site is expected to be made at some point in 2014, and will take full and proper account of potential ecological impacts of development on ecological receptors including the Combe Haven SSSI.
- 1.10 In advance of this application, a strategic overview of the potential impact of the development on the SSSI is provided in **Chapter 2** of this report.



Hastings Borough Local Plan Review

FB1 and FB2

-  Local Plan Sites
-  SSSIs



Figure 1.1

Map Scale @ A4: 1:25,000

Surveyed by: -

Survey date: -

Drawn by: RAH

Checked by: DP

Status: Final



Hastings Borough Local Plan Review

LRA6 and LRA9

-  Local Plan Sites
-  SSSIs

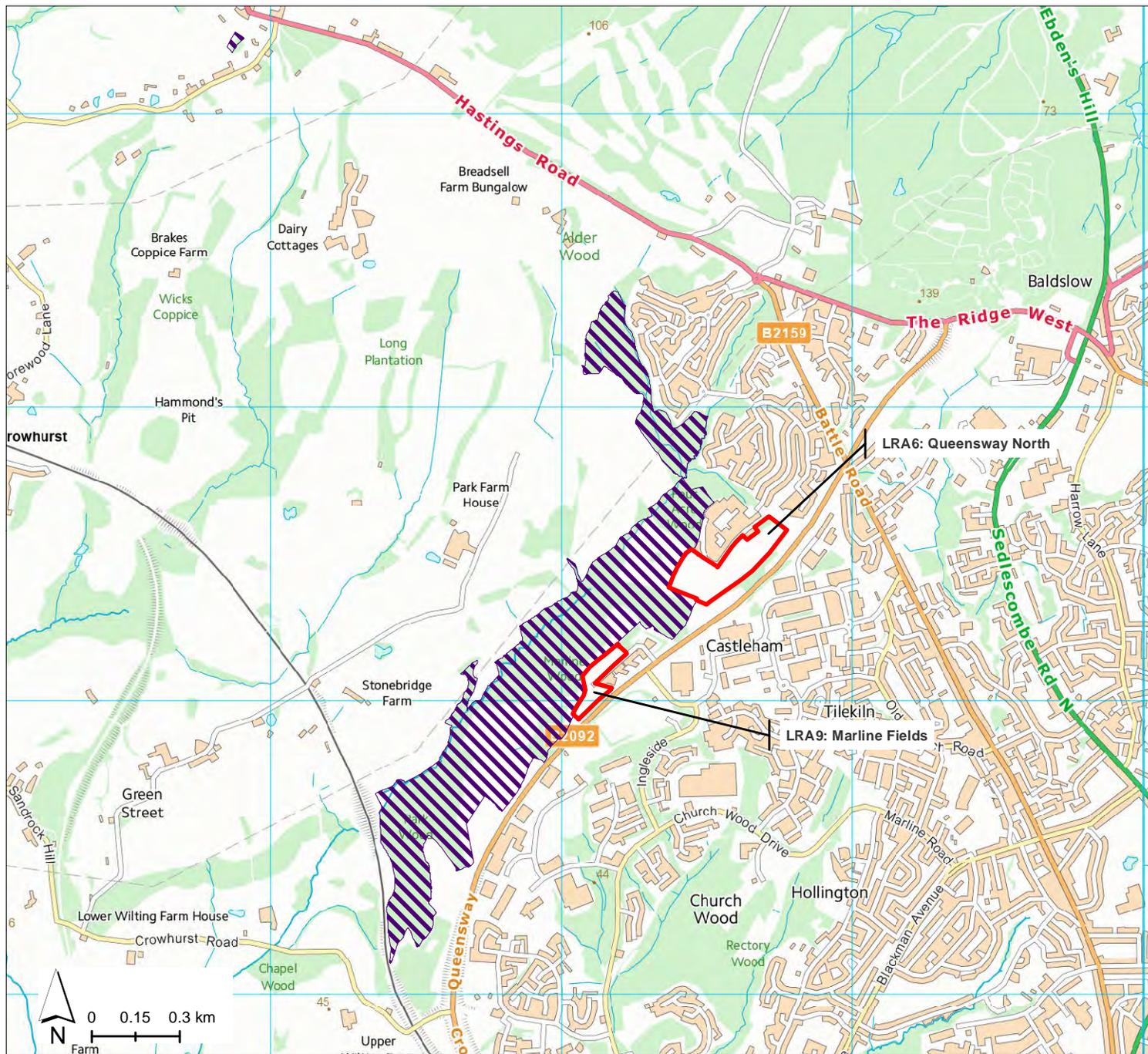


Figure 1.2

Map Scale @ A4: 1:20,000

Surveyed by: -

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Drawn by: RAH

Checked by: DP

Status: Final

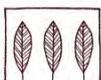


LRA6 – Queensway North, Queensway

- 1.11 Queensway North, is land allocated for employment use that has already received outline planning permission and has been partially developed.
- 1.12 Planning permission for the construction of an estate road and associated infrastructure works (including drainage and utilities) to facilitate future development of the site as a business park was granted in March 2013 with site clearance works commencing the same year. The planning permission includes a number of conditions pertaining to ecology and specifically the protection of Marline Valley Woods SSSI.
- 1.13 As part of the planning application, extensive ecological survey and assessment work was completed in consultation with Natural England including the completion of hydrological monitoring and the development of an appropriate site drainage strategy and buffer around the SSSI to ensure no detriment to the hydrological and associated ecological integrity of the SSSI. Site clearance has also followed European Protected Species (dormouse) mitigation planning and implementation under the auspices of a Natural England licence.
- 1.14 To this end, Natural England have already considered that the impact of the future development of Queensway North will not result in a significant adverse impact on the integrity of the SSSI alone or in combination with the Marline Fields development (LRA9), and no further assessment is considered necessary or reasonable in the circumstances.

LRA9 – Marline Fields, Enviro21 Business Park, Land West of Queensway

- 1.15 Marline Fields has outline planning permission for employment use and part of the site has already been built out with the remaining plots cleared and prepared.
- 1.16 As part of the planning application extensive ecological survey and assessment work was completed in consultation with Natural England including the completion of hydrological monitoring and the development of an appropriate site drainage strategy and buffer around the SSSI to ensure no detriment to the hydrological or ecological integrity of the SSSI. European Protected Species (dormouse) mitigation planning and implementation under the auspices of a Natural England licence was also completed.
- 1.17 To this end, Natural England have already considered that the impact of the future development in Marline Fields will not result in a significant adverse impact on the integrity of the Marline Valley Woods SSSI alone or in combination with the Queensway North development (LRA6), and no further assessment is considered necessary or reasonable in the circumstances.



2 Sites FB1 & FB2

Combe Haven SSSI

- 2.1 Combe Haven SSSI is a 156 ha site designated on account of a range of habitat types including alluvial meadows, reed bed (Filsham reed bed), and ancient woodland which support a wide diversity of plant, invertebrate and bird life (see **Figure 1.1**).
- 2.2 The alluvial meadows, and the drainage ditches which dissect them, are the remnants of a once much more extensive marshland which developed on river alluvium over Ashdown sandstones. Filsham reed bed has colonised poorly drained, ungrazed marsh and a small lagoon is present within the bed. Two areas of mixed tall fen communities are also present within the site. Woodlands have developed on higher ground over Wadhurst clay and support several unusual plants. The whole SSSI designated land, but particularly the reed bed, is valuable for breeding, wintering and passage birds. The invertebrate fauna includes two notable dragonflies and important butterfly populations.
- 2.3 Breeding birds associated with the wetland habitats include reed warbler, moorhen, coot, sedge warbler and water rail. Other breeding birds within the wider site include grasshopper warbler, yellow wagtail and cuckoo. Wintering birds such as lapwing, teal and snipe also depend on the alluvial meadows, and the SSSI is important for passage birds including large flocks of thrushes, finches, warblers and buntings. There is also a rich dragonfly fauna which includes the uncommon species *Coenagrion pulchellum* and *Brachytron pratense*. A good variety of butterflies are present including orange tip, holly blue, red admiral and purple hairstreak.

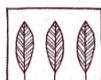
Potential Development Impacts

Construction

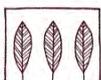
- 2.4 Both FB1 and FB2 are located at sufficient distances from the SSSI (218m and 595m respectively) behind buffers of existing suburban development to ensure that site clearance and construction within FB1 and FB2 are unlikely to result in any direct or indirect adverse impact on the integrity of the SSSI.

Operation

- 2.5 Increases in the local residential population as a direct result of new housing within FB1 and FB2 could theoretically result in an increased use of the public footpath network that runs through the SSSI which theoretically could lead to detrimental trampling impacts and disturbance to wildlife within the SSSI.
- 2.6 In the case of FB1, an existing public footpath occurs close to the northern boundary of the site which leads into the SSSI via a crossing over the Hastings to London rail line. This route is likely to take 3-4 minutes to walk (assuming an average walking speed of 1.4m/s) and consequently means that the SSSI is likely to be a potential recreational walking destination

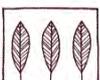


- from FB1, and could be used by both able bodied walkers and dog walkers from the new residential population.
- 2.7 A much longer more circuitous footpath exists between FB2 and the SSSI which is likely to take approximately 15 minutes to walk. Given the time involved, the risk of significant increased use of the SSSI from the new residential population of FB2 is considered low with the longer distance between the two sites likely to put the SSSI out of reach of the casual recreational user or dog walker living within FB2.
- 2.8 The current Natural England condition assessment for Combe Valley SSSI (dated June 2014) confirms that the SSSI is in good condition with no reported problems associated with existing recreational use of the site. Given that the SSSI is already located close to an existing residential population at Harley Shute and a holiday park, it is reasonable to conclude that existing use of the SSSI by recreational users is either not particularly significant and/or is sufficiently well managed to minimise adverse impacts on important ecological receptors within the SSSI as a result of trampling pressure and general disturbance.
- 2.9 Combe Haven SSSI is predominantly a wetland habitat and Filsham Reedbed (within the SSSI) is reported by Sussex Wildlife Trust on their website to be “hard to find” and only accessible via a raised board walk. On this basis, it is reasonable to conclude that a large proportion of the SSSI is unlikely to be easily accessible to recreational visitors, with wetland habitats and vegetation beyond the boardwalk and footpath network acting as a natural barrier to casual users of the site.
- 2.10 In summary, it is considered unlikely that an increase in the local residential population as a direct result of new development within FB1 and FB2 would result in a significant change in the current pattern of recreational use of the SSSI, or that the SSSI is particularly susceptible to adverse recreational pressure given the nature and type of the habitats and footpath access that currently exist.



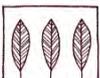
3 Summary

- 3.1 The potential for adverse impacts on two SSSI sites (Marline Valley Woods and Combe Valley) resulting from four separate development proposals put forward within the 2014 Hastings Local Plan have been considered alone and in combination in response to consultation responses from Natural England and the Sussex Wildlife Trust.
- 3.2 Significant adverse impacts on the ecological integrity of both SSSI sites are not predicted to occur because, in the case of Marline Valley Woods SSSI, extensive ecological and hydrological assessment (that has been agreed with Natural England) has been completed for both development sites that adjoin the SSSI and confirms that development could take place with minimal risk to the integrity of the SSSI alone and in combination.
- 3.3 In the case of Combe Valley SSSI, the location, physical nature and low susceptibility of the site to recreational impacts is such that there would be no direct impact on the SSSI as a result of the new residential construction, and the risk of indirect impacts resulting from increased recreational use of the site by the new residential population is considered to be low.



Appendix 1

Consultation responses



Rep ID	Details
5882	<p>(Support) Policy LRA6 - Queensway North, Queensway - Development Management Plan Revised Proposed Submission Version March 2014</p> <p>Respondent: Natural England (Mr John Lister) [637] Received: 9/4/2014 via Email</p> <p>The clauses in the policies for LRA6 and LRA9 (that requires consideration of impact on the Marline Valley SSSI) are supported, but is there a case for wider screening of the potential impact of development of allocations in this part plan area (alone and in combination) on SSSIs.</p> <div data-bbox="212 555 1428 672" style="border: 1px solid black; padding: 5px;"> <p>Full Text: (Show Full Text) See attached - Name: Natural England Submission dated 09.04.14 covering Reps 5882-5886</p> </div> <p>Document is not Sound</p> <p>Soundness Test(s): ii. Justified</p> <p>Representation at Examination: Written representation</p>
5883	<p>(Object) Policy LRA9 - Marline Fields, Enviro21 Business Park, Land West of Queensway - Development Management Plan Revised Proposed Submission Version March 2014</p> <p>Respondent: Natural England (Mr John Lister) [637] Received: 9/4/2014 via Email</p> <p>The clauses in the policies for LRA6 and LRA9 (that requires consideration of impact on the Marline Valley SSSI) are supported, but is there a case for wider screening of the potential impact of development of allocations in this part plan area (alone and in combination) on SSSIs.</p> <div data-bbox="212 1216 1428 1332" style="border: 1px solid black; padding: 5px;"> <p>Full Text: (Show Full Text) See attached - Name: Natural England Submission dated 09.04.14 covering Reps 5882-5886</p> </div> <p>Document is not Sound</p> <p>Soundness Test(s): ii. Justified</p> <p>Representation at Examination: Written representation</p>
5884	<p>(Object) Policy FB1 - The Grove School - Development Management Plan Revised Proposed Submission Version March 2014</p> <p>Respondent: Natural England (Mr John Lister) [637] Received: 9/4/2014 via Email</p> <p>There are a number of significant large residential proposals (notably FB1 and FB2) that have the potential to impact on Combe Haven SSSI and should be screened out or tested in the context of the tests in NPPF (para 118).</p> <div data-bbox="212 1839 1428 1955" style="border: 1px solid black; padding: 5px;"> <p>Full Text: (Show Full Text) See attached - Name: Natural England Submission dated 09.04.14 covering Reps 5882-5886</p> </div> <p>Document is not Sound</p> <p>Soundness Test(s): ii. Justified</p>

	<p>Representation at Examination: Written representation</p>
5885	<p>(Object) Policy FB2 - Former West St Leonards Primary School - Development Management Plan Revised Proposed Submission Version March 2014</p> <p>Respondent: Natural England (Mr John Lister) [637] Received: 9/4/2014 via Email</p> <p>There are a number of significant large residential proposals (notably FB1 and FB2) that have the potential to impact on Combe Haven SSSI and should be screened out or tested in the context of the tests in NPPF (para 118).</p> <div data-bbox="220 548 1436 667" style="border: 1px solid black; padding: 5px;"> <p>Full Text: (Show Full Text) See attached - Name: Natural England Submission dated 09.04.14 covering Reps 5882-5886</p> </div> <p>Document is not Sound</p> <p>Soundness Test(s): ii. Justified</p> <p>Representation at Examination: Written representation</p>
5886	<p>(Object) Policy FB12 - Land south of Upper Wilting Farm - Development Management Plan Revised Proposed Submission Version March 2014</p> <p>Respondent: Natural England (Mr John Lister) [637] Received: 9/4/2014 via Email</p> <p>It is unclear whether Policy FB12 - Land south of Upper Wilting Farm (for wind turbines) has been assessed for its impact on the birds (inter alia) associated with the adjoining SSSI. The SSSI is important for a number of breeding birds and also supports waders and wildfowl such as lapwing, teal and snipe during winter. The latter species, in particular, must be considered vulnerable to displacement and collision impacts.</p> <div data-bbox="220 1220 1436 1339" style="border: 1px solid black; padding: 5px;"> <p>Full Text: (Show Full Text) See attached - Name: Natural England Submission dated 09.04.14 covering Reps 5882-5886</p> </div> <p>Document is not Sound</p> <p>Soundness Test(s): ii. Justified</p> <p>Representation at Examination: Written representation</p>

Rep ID	Details
9565	<p data-bbox="209 219 1407 338">(Object) Section Three - Site Allocations - Development Management Plan Revised Proposed Submission Version March 2014</p> <p data-bbox="209 376 847 405">Respondent: Sussex Wildlife Trust (Laura Brook) [3208]</p> <p data-bbox="209 405 560 434">Received: 22/4/2014 via Email</p> <p data-bbox="209 434 1407 533">The Trust questions the Plan's consistency with national policy, and is concerned that the natural environment and natural capital needed to deliver sustainable housing in Hastings will be compromised. The Trust questions whether the allocations adjacent to and on existing sites designated for their biodiversity value, sit in line with NPPF section 109.</p> <p data-bbox="209 555 1430 629">The Trust urges the Inspector to look at the Plan's site allocations and their impact on the delivery of natural capital. The Plan should be looked at in its entirety to ensure it delivers an ecological coherent network and that development recognises the benefits of ecosystem services.</p> <div data-bbox="209 640 1434 1883" style="border: 1px solid black; padding: 5px;"> <p data-bbox="209 647 501 676">Full Text: (Show Full Text)</p> <p data-bbox="209 676 1423 750">Having viewed the document, the Sussex Wildlife Trust questions the soundness of the Development Management Plan. In particular whether the plan is consistent with national policy and sufficiently performs its environmental role of:</p> <p data-bbox="209 772 1423 846">'contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy'</p> <p data-bbox="209 869 1430 943">In the plan making section of the National Planning Policy Framework (NPPF), paragraph 152 states that: 'Local Planning Authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three...'</p> <p data-bbox="209 965 1430 1039">The Sussex Wildlife Trust is concerned that the natural environment and natural capital needed to deliver sustainable housing in Hastings will be compromised from the allocations that are suggested in the local plan. This is because as the plan currently stands, the allocation maps indicate that there are:</p> <ul data-bbox="209 1061 724 1238" style="list-style-type: none"> * 3 allocations adjacent to SSSI * 5 allocations in Local Wildlife Sites * 15 allocations adjacent to Local Wildlife Sites * 2 allocations in Ancient Woodland * 10 allocations adjacent to Ancient Woodland * 2 allocations adjacent to other Priority Habitats * 6 allocations adjacent to Local Nature Reserves <p data-bbox="209 1261 1398 1312">The Sussex Wildlife Trust questions whether the allocations which are adjacent to and on existing sites designated for their biodiversity value sit in line with NPPF section 109:</p> <p data-bbox="209 1335 1423 1433">'The planning system should contribute to and enhance the natural and local environment by: Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures'.</p> <p data-bbox="209 1456 1430 1554">The Trust's concerns are particularly highlighted through the continued squeeze on Marline Woods SSSI. This ancient woodland site and associated sensitive ghyll stream is allocated to face further pressure from LRA6 (Queensway North) and LRA9 (Marline Fields). We are concerned that there is a conflict between these allocations and paragraph 118 of the NPPF which states:</p> <p data-bbox="209 1576 1423 1704">'Proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a SSSI (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest feature is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSI.'</p> <p data-bbox="209 1727 1430 1800">'Planning permission should be refused for developments resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland unless the need for, and benefits of, the development in that location clearly outweighs the loss.'</p> <p data-bbox="209 1823 1342 1874">The Sussex Wildlife Trust acknowledges that the policies for the allocations in or adjacent to designated sites included requirements for ecological opportunities and constraint maps. However we fe...</p> </div> <p data-bbox="209 1895 448 1924">Document is not Sound</p> <p data-bbox="209 1928 427 1957">Soundness Test(s):</p> <ul data-bbox="240 1957 592 1986" style="list-style-type: none"> iv. Consistent with national policy

From: Lister, John (NE)
Sent: 09 April 2014 10:05
To: Forward Planning
Subject: 114766 - Development Management Plan
Attachments: Natural England Consultation Feedback(v4)_pub_0001 (2).pdf; ATT00001.txt

Dear Planning Team

Thank you for consulting Natural England on your Development Management Plan. My brief comments are as follows:

On the basis of the documents to hand, I am unable to conclude whether development allocations along the western plan boundary have been screened for impact on nearby SSSIs:

- The clauses in the policies for LRA6 and LRA9 (that requires consideration of impact on the Marline Valley SSSI) are supported, but is there is a case for wider screening of the potential impact of development of allocations in this part plan area (alone and in combination) on SSSIs.
- Similarly, there are a number of significant large residential proposals (notably FB1 and FB2) that have the potential to impact on Combe Haven SSSI and should be screened out or tested in the context of the tests in NPPF (para 118).
- It is unclear whether the Policy FB12 - Land south of Upper Wilting Farm (for wind turbines), has been assessed for its impact on the birds (inter alia) associated with the adjoining SSSI. This SSSI is important for a number of breeding birds and also supports waders and wildfowl such as lapwing, teal and snipe during winter. The latter species, in particular, must be considered vulnerable to displacement and collision impacts.

Subject to the comments above, the Development Management Plan is considered sound in respect of the natural environment. We do you consider it necessary to attend and give evidence at the hearing part of the examination, unless this would be helpful.

Due to the current pressure of consultations on land-use plans, I have not been able to spend the time I would have wished reviewing and commenting on your Plan and related documents. Nevertheless, I hope you find these comments helpful.

If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please give me a call.

If you wish to comment on the service provided by Natural England please use the appended form.

<<Natural England Consultation Feedback(v4)_pub_0001 (2).pdf>>

Yours sincerely

John Lister

114766 - Development Management Plan

Lead Adviser

Development Plans Network

Natural England

www.naturalengland.org.uk

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings but attend via audio, video or web conferencing.

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Site reference: FB1 - The Grove School

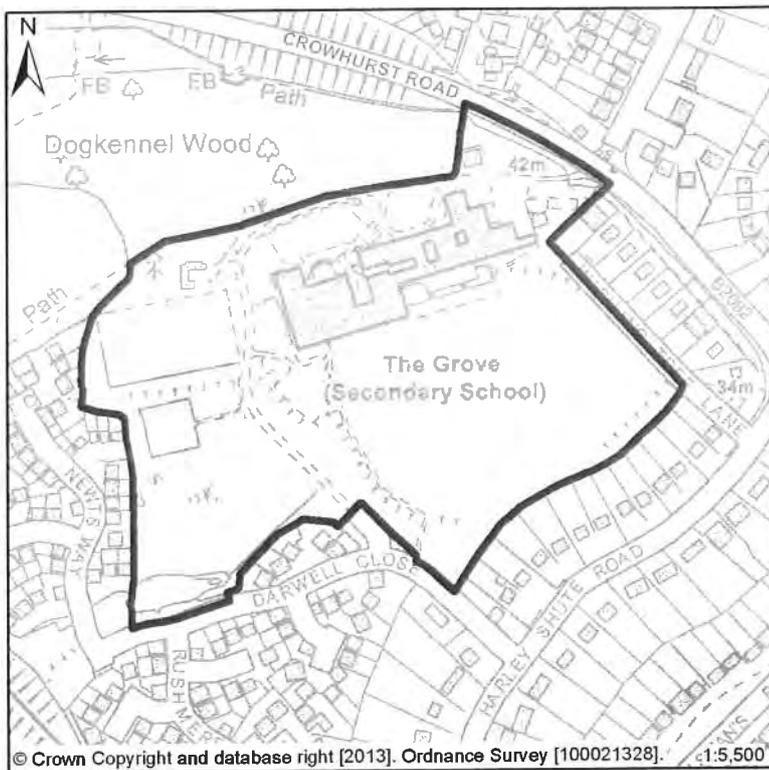


Figure 32: FB1 - The Grove School

Site address: The Grove School
Allocated use: Residential
Area: 9.40ha
Possible net capacity: 240

- 6.88 Site FB1 – The Grove School has become available for development as it is now considered to be surplus to requirement. The majority of the wooded area in the south-west of the site should be retained and not form part of any redevelopment. A density of 30 dwellings per hectare is assumed and therefore the site could be capable of delivering about 240 units.
- 6.89 This is a large and relatively level site, in an existing residential area. Its size and location will be expected to support a varied housing mix; to include affordable houses and specific housing for wheelchair users. There is a Multi Use Games Area on site and its retention or relocation must be included in the development proposals.
- 6.90 Dogkennel Wood to the north-west of the site is an area of Ancient Woodland and this should be conserved, as should existing public footpaths around the site. The County Council’s highway department has commented that the development will require highway junction improvements. The capacity potential of this site indicates that a Transport Assessment and Travel Plan will also be required, further advice is available from East Sussex County Council. Wishing Tree Lane adjacent to the eastern boundary of the site is a privately owned road, if any proposals are to include this road as an access point agreements will have to be made with its owners.
- 6.91 There are areas of surface water flood risk on the site so the management of drainage will be an important consideration. Given the size of the site the Council expects that applications to develop should include investigations into the capacity of that development to include district heating networks or combined heat and power generation. The size of development might also require the inclusion of local services such as a small convenience store.

Policy FB1 - The Grove School

The Grove School is allocated for residential development (possible net capacity 240 dwellings).

The Council expects development proposals for this site to:

- (i) Include affordable housing on site at 25% of the overall housing provision;
- (ii) Include at least 2% of the total number of new homes as fully adapted dwellings for wheelchair users;
- (iii) Include an Ecological Constraints and Opportunities Plan, including specific reference to the presence of the adjacent Ancient Woodland and Local Wildlife Site, and incorporate conservation and mitigation measures as recommended by the Plan as appropriate;
- (iv) Provide an arboriculture plan that demonstrates how existing trees on site will be integrated into the development, or how compensation will be made for their loss;
- (v) Include formal open space and green space within the site;
- (vi) Include a Flood Risk Assessment and incorporate measures to address surface water flood risk such as Sustainable Drainage Systems;
- (vii) Investigate the feasibility for district heating and/or Combined Heat and Power systems on site;
- (viii) Contribute to the improvement of existing play facilities in the surrounding area;
- (ix) Secure the retention or relocation of the Multi Use Games Area;
- (x) Include walking and cycling links to improve local connectivity and to preserve the Public Right of Way at the north of the site;
- (xi) Be supported by a Transport Assessment and Travel Plan. Proposals should indicate how the conclusions and recommendations of the Assessment have been incorporated; this is likely to include improved access to the site and to potentially include junction improvements on Harley Shute Road and/or Crowhurst Road as advised by the Local Highways Authority;
- (xii) Ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes as advised by Southern Water.

Additional guidance is also given in a design brief for this site in Appendix A.

All policies of the Local Plan will be applied, as appropriate, to any scheme presented to the Council.

Site reference: FB2 – Former West St Leonards Primary School

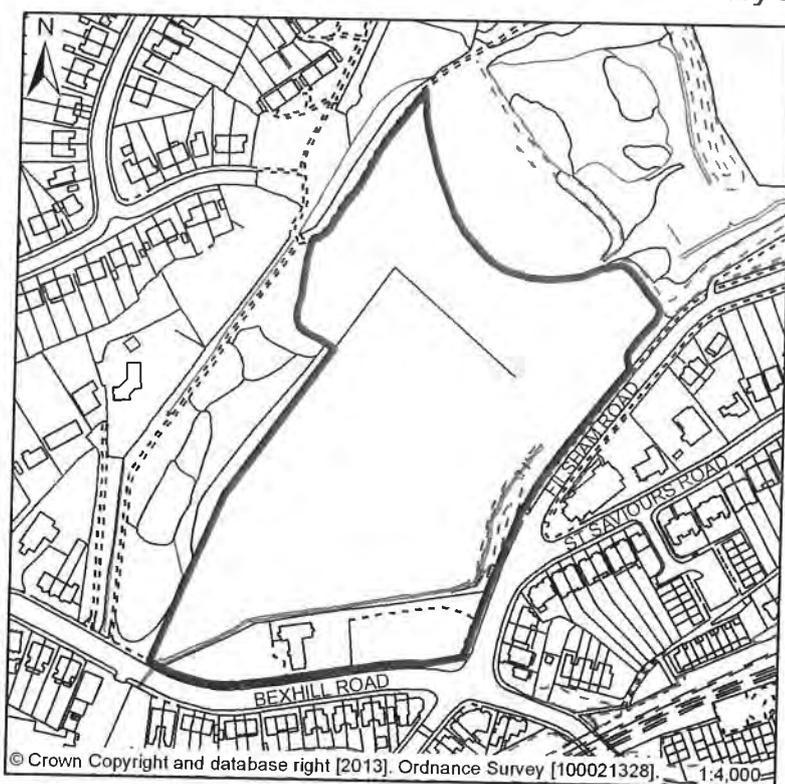


Figure 33: FB2 - Former West St. Leonards Primary School

Site address: Former West St Leonards Primary School

Allocated use: Mixed use (residential and community)

Area: 3.92ha

Possible net capacity: 100

- 6.92 Site FB2 – Former West St Leonards Primary School is a predominately vacant site that could support at least 100 housing units.
- 6.93 The Council will expect any development to achieve high standards of sustainable design and construction. There is an area of tidal and fluvial flood risk (Zone 3) on the site and so a Flood Risk Assessment will be required and mitigation as advised by the report should be incorporated into any potential scheme. There is also the potential for surface water flood risk so suitable mitigation should also be included for this.
- 6.94 This site will be expected to support a housing mix to include affordable housing and specific housing for wheelchair users. All vehicular access will be from Filsham Road. The capacity potential of this site indicates that a Transport Assessment and Travel Plan will be required, further advice is available from East Sussex County Council. Pedestrian/cycle links are proposed to the west and south. A buffer zone is indicated in the design brief (see Appendix A) at the junction of Filsham Road and Bexhill Road to accommodate a bus lane.
- 6.95 The site adjoins the South Saxons Local Wildlife Site (LWS) to the west and north, and this nature conservation area needs to be safeguarded in the layout of the site. Part of the site was formerly a tip and may still produce landfill gas. There is also a small area of contaminated land in the north-western corner of the site. An assessment of potential contamination will therefore be required. A buffer zone should be maintained on either side of the Hollington Stream in the southern and western parts of the site. The stream is an important ecological asset and is also engineered to avoid unacceptable flood risk so close working with the Council and the Environment Agency is encouraged and opportunities to create a feature of the stream should be explored.
- 6.96 The Community Hall in the southern part of the site is nearing the end of its useful life and developers will be expected to provide a replacement building. This could be sited adjacent to the existing building.

Section Three: Site Allocations

Focus Area 3: Filsham Valley & Bulverhythe

Policy FB2 - Former West St Leonards Primary School

Former West St Leonards Primary School is allocated for mixed use development including residential and community uses (possible net capacity 100 dwellings).

The Council expects development proposals for this site to:

- (i) Include affordable housing on site at 25% of the overall housing provision;
- (ii) Include at least 2% of the total number of new homes as fully adapted dwellings for wheelchair users;
- (iii) Include an Ecological Constraints and Opportunities Plan, including specific reference to the presence of the adjacent Local Wildlife Site, and incorporate conservation and mitigation measures as recommended by the Plan as appropriate;
- (iv) Provide an arboriculture plan that demonstrates how existing trees on site will be integrated into the development, or how compensation will be made for their loss;
- (v) Provide new formal open space within the site;
- (vi) Include a Flood Risk Assessment and flood resilient design as appropriate to the outcome of that report;
- (vii) Incorporate measures to address surface water flood risk such as Sustainable Drainage Systems;
- (viii) Provide for the replacement of the Community Hall. The Hall is to be provided prior to the completion of the housing development;
- (ix) Contribute to the improvement of existing play facilities in the surrounding area;
- (x) Accommodate a bus lane on the Bexhill Road up to the junction with Filsham Road;
- (xi) Be supported by a Transport Assessment and Travel Plan. Proposals should indicate how the conclusions and recommendations of the Assessment have been incorporated;

Additional guidance is also given in a design brief for this site in Appendix A.

All policies of the Local Plan will be applied, as appropriate, to any scheme presented to the Council.

