

Towards a Lewes Local Plan: Spatial Strategy and Policy Directions

Please respond to the consultation by completing the questions below. Return by email to LocalPlan@lewes-eastbourne.gov.uk or by post to: Lewes District Council, c/o Eastbourne Town Hall, Grove Road, Eastbourne, BN21 4UG.

Your Details

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What type of stakeholder are you / who are you representing: (place 'x' in against box)

<input type="checkbox"/>	Member of the public (Resident of Lewes District)	<input type="checkbox"/>	Residents Association
<input type="checkbox"/>	Member of the public (Resident elsewhere)	<input type="checkbox"/>	National group / organisation

	Local business / employer		Planning Consultant
	Neighbouring District / Parish Council		Landowner / Developer
X	Local group / organisation		Infrastructure / service provider
	Other – please describe:		

Vision and aims

What are your views on the proposed vision and aims?

CPRE Sussex supports, in principle, the 'green' vision set out here; it is very welcome to see the focus on environment, climate change, inclusion and affordability.

However, while there are a number of very welcome strategic policies proposed, we are deeply concerned that the fundamental approach to spatial strategy and settlement pattern used in this draft Local Plan would deliver the exact opposite. Virtually all the new housing proposed for rural villages is in locations that are intrinsically unsustainable.

Is there an alternative vision or aims (or parts of) that we should be considering?

The vision is not the problem. The problem is that the proposals would not deliver the Vision.

Spatial Strategy

Do you agree that the proposed range identified to determine the housing requirement is the correct approach? If not, please explain why.

CPRE Sussex is pleased to see that the Planning Authority has not blindly adopted a housing target spat out by the mutant algorithm of the 'Standard Method', and has begun to focus on identifiable local need. It is commendable that Lewes recognises its 'exceptional circumstances' (para 61, NPPF) including the constraints of landscape and infrastructure, as well as more up-to-date demographic figures, and identifies its housing need as being in a lower range than the Standard Method's calculations. As the draft makes clear, Lewes (like many other councils faced with ridiculous "standard method" targets inflated by the affordability factor) will, in any case, be unable to meet a 'standard method' target.

As registered deaths in the Lewes District exceed registered births, 'housing need' in Lewes District is primarily to support arbitrary levels of in-migration from

elsewhere in the UK. This need, arbitrarily assessed by central government at about 500 dwellings per year on the basis of old population projections that are known to be obsolete, is then inflated in the “standard method” algorithm by an “affordability factor”, whose sole purpose is to inflate housing targets in those areas of England that are most profitable to greenfield developers.

There is undoubtedly a housing crisis affecting some local residents whose needs for subsidised affordable-rented housing are unmet. The “housing need” numbers created by the “standard method” algorithm are entirely unrelated to meeting this need.

However, while we commend Lewes’s boldness in seeking to use an alternative approach to the Standard Method, we are concerned that there is, as yet, too little supporting evidence within the Council’s current evidence base to justify, at examination, a (rightly) lower target. This is a major flaw and must be urgently rectified.

In reaching both an appropriate overall figure for housing need *and* a spatial strategy that looks to distribute housing appropriately across the District, CPRE Sussex is very concerned that that there has not as yet been any formal agreement about the proposed split of the (Standard Method) target for Lewes District between the SDNP and the rest of the District.

This should have been the first step. Lewes town is the largest town within the SDNP, and by some distance the most sustainable town within Lewes District (1.0 cars per household; 2011 census), and there are clearly some redevelopment opportunities within the town that are expected to come forward, and indeed should come forward, within the Plan period. However, the likely delivery is very far below the level assumed in the draft Local Plan. It would in CPRE’s view be entirely inappropriate for the new Local Plan to anticipate or rely on any significant level of new housing to be provided within the SDNP countryside within Lewes District.

It is of course essential, and required by the NPPF, that the new housing needed is provided where it is required, located where it is needed, and of the right type to meet local housing need. There is no doubt that there is a critical shortage of some types of accommodation, particularly a critical shortage of smaller affordable homes within the District’s towns.

Do you think there is an alternative settlement hierarchy that we should consider? If so, what is it?

CPRE Sussex strongly supports the conclusion that the proposed 'Eton Mess' new town just outside the SDNP between East Chilington and Plumpton Green (option 6 of the previous Issues & Options consultation) is not a viable or desirable option, nor an option likely to be deliverable within the Plan period, and that this proposal should be discounted.

In the view of CPRE Sussex the Hamsey parish site identified as potentially suitable for over 1,000 new homes is also entirely unsuitable. Not only is Hamsey parish shown by data available from East Sussex in Figures as highly car-dependent, but the triangular site is immediately bounded on two of its three sides by the SDNP boundary, and any development here, let alone on the scale proposed would have a strongly negative impact on the immediate setting of the SDNP, contrary to the provisions of the NPPF and at least three recent appeal decisions for local sites.

CPRE would expect that a draft Local Plan at this stage of development would identify and tabulate where new housing is proposed by settlement. That was the case for the previous Local Plan at the equivalent stage of development. That is the case in the recently presented draft Local Plan for Wealden District. That approach is essential (a) to ensure that that the distribution of new houses matches the need and also (b) to enable consequent infrastructure issues to be identified and assessed. The infrastructure consequences of the draft proposals to add, in some cases, thousands of new homes to villages in the countryside are simply not considered in the Infrastructure Delivery Plan. It is thus very likely that many of the proposals are undeliverable, within the Plan period or at all. It appears, for example, that the very large housing numbers proposed for different Ringmer sites would radically change (destroy) that village's character and overwhelm its infrastructure. However, the failure to include settlement totals in the draft means that this issue is not addressed in the draft itself, and is difficult for others to address.

At the previous Issues and Options stage in the Local Plan's evolution the principal issue consulted on was the choice between alternative strategies for accommodating the necessary new development. The preferred options were those in which the majority of the new housing would be located in the District's urban areas. It is therefore both astonishing and alarming that (with the exception noted above of option 6 being discounted) so little attention has been paid to the outcomes of that previous consultation. The most popular options in the previous consultation were options 1-3, which are in line with the requirements of the NPPF that new housing should be delivered where it would be most sustainable. That is, however, in stark contrast with what it appears to CPRE Sussex is now proposed, where virtually all the newly-identified housing sites are in and around car-dependent villages in the Low Weald (options 4 and 5, which were supported only by profit-motivated greenfield developers).

The 2016/2020 Local Plan first identified a few strategic sites but then relied on the local knowledge of local communities to determine the actual development sites within that community, through Neighbourhood Plans. Several communities have more than delivered the required new housing in this way. That is especially

important when, as here, a small Planning Policy team with rather limited local knowledge has two Local Plans to deliver. Rather than attempting to repeat this successful strategy, a completely different approach is taken in the current draft. There should have been more consultation with communities and a much stronger role given to Neighbourhood Plans, where communities are willing to accept that role.

The new proposals are instead almost entirely developer-led. Developers' priorities are, by legal requirement, to maximise profit to shareholders from the sites that they control. This is not an approach that could ever prioritise the delivery of the types of new housing actually needed at the locations they are needed. That is the proper role of the planning system, which is required by the NPPF to be community-led. The sole attempt to attempt to assess urban capacity to deliver new development has been superficial and completely inadequate.

The draft Local Plan should have prioritised the delivery of the so-far-undelivered urban sites allocated in the 2016 Local Plan. Developers given a free choice, as they have been, will inevitably focus their delivery on car-dependent greenfield sites in the countryside. That is demonstrably what has happened under the 2016/2020 Local Plan, which has in this respect been a failure in that it has delivered predominantly the wrong houses in the wrong car-dependent places, rather than the priorities the NPPF requires. This could and should have been achieved by inclusion of a brownfield-first and sustainable location-first phasing policy in the new draft Local Plan.

The draft Local Plan fails to take account of readily available evidence about where new housing is really sustainable. The key evidence about actual car ownership in different communities within the District, and about changing trends in those communities, is available, but is ignored. It is hard to conclude that this is an omission. Pious words will simply not make unsustainable car-dependent village housing suddenly change their habits. People will (and do) use sustainable travel options, but only when they are housed at genuinely sustainable locations.

We have concerns that, *despite* the reasonable levels of bus service enjoyed by (for example) Ringmer and Newick, the experience of development in these locations over the last 20 years has been that the car parking required by village residents has simply been squeezed onto the already inadequate local road network. This ongoing reliance on cars reflects the demographics and needs of people living in those areas, as well as the limited range of services available even in these larger villages.

We are concerned that increasing housing numbers at higher development densities in locations like Ringmer would simply see more of the same, and would fundamentally undermine the Plan's themes around sustainability.

Climate Theme

Are there any further policies you would like to see included to respond to Climate Change? Why do you think they should they be included?

Much of the proposed response to climate change, especially in relation to the refurbish and use of buildings, and requirements on new-builds, is welcome in principle. We would like to see clarity that all new buildings will be required to be zero carbon in operation, using a fabric-first approach, with minimised energy use and onsite renewables. The solar PV requirements are very welcome, especially if the Future Homes Standard does not ultimately take this line.

Our significant and over-riding concern on climate, however, is that the housing numbers and locations seemingly proposed for new development are entirely contrary to the demands of tackling climate change. Transport is not addressed in the climate change theme, but rather in the infrastructure section; this seems to be problematic, as it downplays the fact, stated in Policy IC8, that “Transport related emissions are one of the largest contributing source to climate change, as well as having an impact on the quality of the environment”. While there are fine words in Policy IC8 about encouraging modal shifts, the proposals indicated in Spatial Options 4 and 5 do not appear to support them, as large amounts of development are focused on relatively car-dependent centres, rather than on denser urban locations that support ‘20-minute’ neighbourhoods. The suggestions on more EV charging points in IC9 are welcome, but there is a lack of overall coherence in relation to development locations, transport and climate.

Finally, while we support the broad-brush principle of identifying in the Plan areas for larger-scale renewable energy, we think it is critical that landscape and biodiversity impacts are properly considered and that communities are properly-engaged in a bottom-up process to identify the detail of what renewables should go where. The absence of policy support for community-owned schemes (as, for example, Mid Sussex DC has), is disappointing.

Should the new local plan require minimisation of and compensation for the loss of carbon sequestration, and if so, how should off site compensation be addressed?

Natural Environment Theme

Are there any further policies you would like to see included to protect and enhance our natural environment? Why do you think they should they be included?

We would support any commentary by Sussex Wildlife Trust in relation to this policy area.

Do you think the policy direction for Green and Blue infrastructure is the right one? If not, please identify how it can be changed and why?

Do you think the policy direction for Biodiversity is the right approach? If not please identify how it can be changed and why?

The policy direction is welcome in principle, but CPRE Sussex has grave concerns about the capacity for monitoring and enforcement. A welcome policy is meaningless unless it is enforced. Is the Council able to enforce delivery? We are concerned that the direction of travel in Policy NE2 places insufficient emphasis on *on-site* BNG. Allowing local biodiversity to be destroyed and the policy to be met by off-site biodiversity delivered elsewhere is a recipe for reducing biodiversity in Lewes District.

Should the local plan consider preparing an urban greening policy which requires a minimum level of greening on a development site?

Yes. This is not only an environmental question but one of inclusion and equity. People in urban environments (often people experiencing disadvantage of one or more kinds) are less likely to have access to nature. The Plan should commit to development that means everyone is within a 15-minute walk of a park or green space.

Homes for Everyone Theme

Are there any further policies you would like to see included to meet housing needs? Why do you think they should they be included?

As we make clear below, we think that the Affordable Housing policy is not strong enough.

While it is welcome that the policy will require more 2-bed homes than any other type on developments over 10 dwellings, we believe that it should go further, and be much more directive/prescriptive about the appropriate mix to ensure that new development delivers the types of houses actually needed to meet the housing crisis. These are smaller dwellings, especially 2-bed and 3-bed affordable-rented dwellings in the District's towns, that the Council's own housing data show are those needed to mitigate the current crisis.

Do you agree with the emphasis on securing two-bedroom homes through new development and retaining smaller homes in the housing stock? If not, please explain why.

Yes, but the policies proposed are not strong enough.

Do you agree with the affordable housing policy direction that is being set in the Affordable Housing policy? If not, please identify how it could be changed.

No. All new greenfield housing should be required to deliver at least 40% affordable housing *on site*. There is no evidence that this is not affordable for this type of development. The policy change proposed would exacerbate the housing crisis. Redevelopments are less profitable, and here the emphasis should be on more robust challenge to demands to reduce affordable housing delivery on viability grounds. The Council's own record of actually delivering affordable housing using developer contributions is poor – far too few and far too late.

The need for a more robust approach on affordable housing ties directly to the question of overall housing numbers. Greater boldness in policy on affordable homes (especially for rent) will play a greater role in tackling the affordability crisis than giving a large number of planning permissions to volume housebuilders.

Do you agree with prioritising rented affordable tenures over affordable home ownership tenures? If not, please explain why you think different tenure proportions should be sought.

Yes

Can you identify specific sites that could accommodate Gypsies and Travellers? If you can identify a site, please submit it to our call for sites using the form on the consultation portal.

Economy and Regeneration Theme

Are there any further policies you would like to see included to meet economic and regeneration needs? Why do you think they should they be included?

Farm diversification has been successful in delivering new local employment options and supporting the rural economy.

Do you agree with the policy direction for employment and economic development? What other issues should the policy consider?

Do you agree with our policy direction relating to retail and leisure? If not, what would you change and why?

Infrastructure and Community Facilities Theme

Are there any further policies you would like to see included to meet the need for infrastructure and community facilities? Why do you think they should they be included?

While we welcome some of the aspirations on transport (see above comments), and the novel policy on local food infrastructure, overall the infrastructure delivery plan is weak, and almost content free. This is because the failure to identify settlement targets noted above has led to a consequent failure to identify the specific local infrastructure needs of each town, village and hamlet.

Should there be a separate policy on resisting the loss of playing pitches?

There is already a strong national policy.

Should a design-led policy for parking standards be progressed and included in the next version of the local plan?

Yes. New development *in the countryside*, as currently proposed, will bring more private cars and more private car travel into the District, as the locations and densities will not support adequate public transport, or the necessary facilities within a 15-20 minute walk or cycle. The new development in villages in the countryside must, therefore, provide off-road parking with EV chargepoints for these extra cars. As we set out above in our comments on the Spatial Strategy, the history of development in Ringmer and Newick suggests that modal shift has proven hard to achieve even in these larger villages with reasonable bus connections. Development proposals and parking standards in these locations should take this experience into account, just as much as in the smaller villages. Simply adding more housing at higher densities will not automatically lead to a more sustainable transport mix.

How should we seek to manage cycle hire schemes to encourage the modal shift but at the same time avoid their potential for cluttering the street scene?

Design, Landscape and Built Environment Theme

Are there any further policies you would like to see included to guide Design, Landscape and the Built Environment? Why do you think they should they be included?

Do you agree with the proposed policy directions that are being considered for further development? Are there alternatives that we should be looking at?

Do you think that having concept masterplans for all residential development sites would assist in bringing forward sites and retain the design quality of the development? If yes, what stage of the plan should these be prepared and agreed?

It's a fine aspiration, but presently the Council struggles to provide even basic pre-application advice. The Development Management team appear unlikely to have the capacity to do this, even were they to have the expertise. Lewes has had an Architectural Advisory Panel which would have the ability to do this, but current DM policy is not to consult it.

Many of the site plans submitted by applicants are profit driven and very poor. They certainly need improvement. The concentration of affordable housing into blocks of flats without private garden spaces or adequate parking is a recipe for creating slums of the future. Currently this appears to be supported by the Council, whose officers routinely fail to support its policies (pepper potting, etc). The policies are fine - they just are not implemented by the Council.

Water Theme

Are there any further policies you would like to see included to respond to water resources and water management? Why do you think they should they be included?

Every river and major stream in Lewes District is currently unacceptably contaminated by sewage treatment failures by Southern Water. This includes the District's precious chalk streams. Southern Water's regulators appear perfectly happy with this worsening situation. Lewes District residents are most unhappy. While this is a national issue, Lewes District is much worse affected than most.

Policy W2 could usefully be explicit that the Planning Authority may seek to use 'Grampian conditions' to require upgraded water infrastructure to be in place prior to development commencing.

Should the water quality policy specify standards for development for intensive livestock production?

Is this a local rather than a national issue?

Should the new local plan continue with the existing policy approach set out in Policy DM18: Recreation and Rivers or go further and consider specific locations for recreational uses, and other, or more specific areas/water bodies.

As Southern Water has no identified or deliverable plans to remedy the current disgusting pollution of the Ouse and its tributaries within the Plan period, encouraging their recreational use would probably not be a good idea. Were this to change, our answer might be different.