

Lewes District Local Plan Part 2 Examination

Additional comments and proposed revised policy on **Residential Sub-Divisions** submitted at the request of Inspector Fox by the Lewes District Branch of CPRE Sussex

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Matter 9.7 Residential Sub-Divisions

The current draft policy DM8 reads

Policy DM8: Residential Sub-Divisions and Shared Housing

Within the planning boundaries, as defined on the Policies Map, proposals for the sub-division of existing dwellings to flats or the conversion of existing dwellings to houses of multiple occupation or other forms of shared housing will be permitted where the following criteria are met:

- (1) there is adequate provision for car parking, private amenity space for residents, and storage for bicycles and recycling/refuse containers;**
- (2) the proposal would not result in unacceptable harm to the amenities of neighbouring residential properties through loss of privacy or daylight or levels of activity that give rise to excessive noise or disturbance;**
- (3) there would be no adverse impact on the character of the immediate**

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locality through the cumulative impact of physical alterations or extensions to the original dwelling or other structures;

Development proposals within 7km of the Ashdown Forest will only be permitted where they comply with Core Policy 10(3) of the Local Plan Part 1.

Commentary

- 1.01 Paragraph 4.27 correctly identifies an important issue, but policy 4.8 addresses just one way in which proposals for the subdivision of larger dwellings into smaller units may help address it.
- 1.02 The type of sub-division currently addressed by the policy is the sub-division of urban terraced houses into two or more flats. This emphasis is understandable, because proposals for this type of sub-division are common and can be particularly problematic, especially when such sub-division occurs in several different properties in terraced streets with small gardens and inadequate off-street parking.
- 1.03 However, other types of sub-division of larger properties also occur, in both urban and rural areas, with the same beneficial consequence of improving the availability of small homes. The new smaller homes created are not necessarily flats, as the present text assumes. Particularly

common in suburban and rural areas is the conversion of redundant granny annexes or other ancillary accommodation to small independent units of accommodation. This should also be encouraged, as the alternative is often under-occupation of large dwellings.

1.04 NPPF (2019) paragraph 79 specifically permits the sub-division of larger dwellings even when isolated in the countryside, so the changes proposed below would bring the policy into line with current national policy.

CPRE Sussex recommends that the first paragraph of policy DM8 should read:

Policy DM8 Residential Sub-Divisions and Shared Housing

Proposals for the sub-division of existing dwellings to form smaller dwellings or the conversion of existing dwellings to houses of multiple occupation or other forms of shared housing will be permitted where the following criteria are met:

[Remainder of the policy as in the draft policy]

This modification to Policy DM8 would also require as matching amendments:

Paragraph 4.27:

Delete “within the settlement planning boundaries” from the end of the paragraph.

Paragraph 4.28:

Replace “the conversion of single dwellings into flats” by “the sub-division of dwellings”.