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Lewes Local Plan part 2 Examination: additional evidence from Ringmer Parish Council

Matter 3. Housing Provision.

Matter 3.1. New Homes Quantum.

3.1.1. We have previously commented that there is a measure of double counting in Table 5 of the Local Plan part 2 because site RG01 (Caburn Field, proposed to accommodate 90 homes) is a larger site than that previously allocated in the 2003 Local Plan as RG1 to accommodate 40 homes. The new larger site RG01 incorporates Ringmer Neighbourhood Plan (RNP) site RES3, whose planned delivery is already included in the RNP total.

3.1.2 However, delivery of 90 homes on even the expanded site would also require (a) a much higher development density that is far outside the range of 20-30 dph considered appropriate for a village location in the Local Plan part 1 and also (b) the use for residential development of land currently actively used and needed as public open space and the Ringmer skateboard park, contrary to both national policies and specific policies in the RNP.

3.1.3 Since the Local Plan part 2 was published planning application LW/18/0808, seeking approval for 96 homes on site RG01, has been determined. During the consideration of the application it became apparent that the original proposal was incompatible with both national and local policy on housing density, layout, interaction with existing neighbouring houses and design. A revised proposal for 77 homes was developed and now has full planning permission, with the support of Ringmer parish council. The site will thus not accommodate 90 homes, but the delivery of 77 homes here still comfortably exceeds the 40 new homes envisaged on the 2003 site RG1 plus a further 8 on the adjacent RNP RES3 (total 48). Amendments to the housing number tables in the draft Local Plan part 2 and to policy RG01 are thus necessary for them to become justified.

Matter 3.2. Distribution of new homes

3.2.1 The failure of the Sustainability Appraisal accompanying the Local Plan part 2 to distinguish between the different implications of urban and rural housing development for carbon dioxide

emissions and climate change means that the site selection process followed is unjustified and not in accordance with national policy.

3.2.2 The village of Ringmer and the town of Lewes are three miles apart and have closely comparable median household incomes. They are however separated by the very congested A26/B2192 Earwig Corner junction. Ringmer has a very good bus service by rural standards, albeit to a restricted range of destinations. Nevertheless, car ownership in Lewes town averages 1.0 car per household, while in Ringmer it is 1.5 cars per household [East Sussex in Figures website based on 2011 census data]. The Ringmer cars also do a much higher average mileage, with far higher use of the private car for travel to work and much lower commuting by public transport by Ringmer residents. Even the small minority of Ringmer residents who are recorded as commuting by public transport to their place of employment often start their journey by driving to Lewes railway station (which is not served by the Ringmer buses).

3.2.3 As the Inspector who examined the Local Plan part 1 recognised, village developments are inherently less sustainable, more car-dependent and contribute more to carbon dioxide emissions and climate change. While some rural housing is essential to meet local need, locating new commuter housing in rural communities rather than in urban areas is inherently unsustainable.

Matter 3.3. Housing delivery.

3.3.1 As noted above in paragraph 3.1.2 planning application LW/18/0808 to deliver 77 homes on site RG01 (Caburn Field) has now been approved and detailed negotiations between the developer and the council have confirmed its viability. As the enabling planning applications LW/18/0789 and LW/19/0790 for new sports facilities have also been approved, at a significant cost to the developer, there is now no reason to believe that this long-stalled development will not proceed expeditiously, with delivery in the period 2020-2022. The RNP development process was central to the re-activation of this plan.

3.3.2 Delivery at other RNP sites has, in general, been fast and quantitatively similar to expectations. Full permission for the major strategic site in Ringmer [policy SP6 of the Local Plan part 1] has been granted for 110 units, the exact number envisaged in the Local Plan part 1. Every RNP site allocated for 10 or more units has now achieved full planning permission with the exception of a single village-centre site specifically allocated for the RNP 2024-2030 second phase. All those larger sites with planning permission are either building or making good progress through the delivery process. There have been some minor deviations (in both directions) from the planned delivery, but overall more over-delivery than under-delivery. A number of the smaller sites identified during the RNP development process were approved and delivered faster than the RNP itself. Of a total of 317 planning permissions granted, only one single project (a barn conversion to a single dwelling) appears to have stalled.

3.3.3 In addition several 'windfall' planning permissions for in total 18 dwellings have been granted in Ringmer since 2014. All 18 have either been delivered or are currently building.

3.3.4 Together this amounts to compelling evidence for the ability of Neighbourhood Plans to deliver new housing speedily and with community support.

Matter 3.4. Five Year Housing Land Supply.

3.4.1 There are several smaller RNP sites that have not yet come forward. We identify RNP allocated sites RES2, RES10, RES13, RES14, RES17, RES20, RES21, RES22, RES24 & RES25 as very likely to come forward and deliver new housing within the next 5 years. We also believe that they are likely to deliver more new homes than the 38 allocated. Omission of most of these RNP sites from the District's 5-year housing land supply is unjustified.

Matter 3.5. Qualitative aspects of housing supply.

3.5.1 Our experience of actual housing delivery by developers under the RNP has demonstrated that without direction from policy the types of housing they will choose to deliver will not match the types of housing needed. There are currently no relevant policies in the draft Local Plan part 2 to ensure that the housing delivered matches that needed. The Plan will be both ineffective and contrary to national policy [2019 NPPF paragraph 61; 2012 NPPF paragraph 50] unless such policies are included.

3.5.2 The developer-led housing mix will naturally focus on profit maximisation, rather than on meeting need. Their preference in this area is for large high value detached houses marketed primarily to long-distance commuters, whether or not the location offers a suitable base for such commuters. They will also seek to minimise the size of affordable housing units – 16 of the 22 affordable rented homes to be delivered on the Ringmer strategic site SP6 will be 1-bed units, despite high rural travel costs making such housing a low priority in villages such as Ringmer.

3.5.3 This is in stark contrast to the types of housing needed. The RNP seeks to deliver in Ringmer primarily the types of housing required to meet local needs. These are identified as (a) affordable or low cost 2/3-bed family housing suitable for local families and including those employed in Ringmer but currently unable to afford to live here and (b) additional housing specifically designed to meet the needs of the older residents identified by the 2016-based ONS household projections as responsible for 90% of the additional households expected to be formed in England by 2041. We very much doubt that this situation is confined to Ringmer.

3.5.4 If any additional housing sites prove to be needed, they must be identified through a community-led mechanism that ensures they are suitable to deliver the types of housing needed. Merely adding random sites that happen to have been promoted through the SHELAA

or by developers present at the Examination to promote specific sites currently excluded would be an ineffective method of site selection. A systematic failure in the developer-led SHELAA system is that it identifies mainly rural greenfield sites, rather than the more sustainable urban brownfield opportunities. It is the same rural greenfield sites that are most aggressively promoted by developers.

