

Lewes District Local Plan Part 2 Examination

Further comments made by the Lewes District Branch of CPRE Sussex

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Matter 10 Site Allocations

Matter 10.3. Other suggestions for housing sites in the Plan.

- 10.3.1 If any additional housing sites prove to be needed, they must be identified through a community-led mechanism that ensures that the most sustainable sites are selected and that they deliver the types of housing needed. Merely adding sites that happen to have been promoted through the SHELAA or by developers present at the Examination would be an ineffective and unjustified method of site selection.
- 10.3.2 The SHELAA system is inherently biased towards greenfield sites in the countryside, rather than the more sustainable urban brownfield opportunities, and it is these same countryside greenfield sites that are most aggressively promoted by developers. Owners of brownfield sites or of sites within planning boundaries see no reason to participate in the SHELAA exercise. Site selection on this basis, without regard to sustainability or meeting need, would be contrary to national policy. Site selection should be community-led rather than developer-led and should be focused on sustainability and meeting community need.
- 10.3.3 If any additional sites are needed for this Plan the focus should be on sites capable of meeting the main identified needs, which are for more affordable housing and more 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.
- 10.3.4 The need for additional affordable housing can best be met by the allocation of additional exception sites or other sites specifically earmarked for the provision of affordable housing.
- 10.3.5 The need for additional housing specifically designed to meet the needs of the older residents can best be met by identification of centrally-located urban sites with all necessary facilities within easy reach or through the provision of one or more retirement villages with a good range of facilities on-site and communal transport arrangements.
- 10.3.6 In addition if it is established that additional housing is required within the District to meet the overall District target, the CPRE submission under Inspector's matter 3.1 makes a strong case that more of that new housing should be delivered sustainably within that part of the District within the South Downs National Park.