



Hearing Statement – Matter 3 Housing

Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD

Prepared for Bellway Homes Limited (Kent)



Contents

1.	Introduction	1
2.	Matter 3: Housing	2

1. Introduction

- 1.1. This Hearing Statement is prepared and submitted by Savills on behalf of Bellway Homes in response to Matter 3 of the Inspector's Matters, Issues and Questions Discussion Note issued 5th February 2019. Bellway Homes has not responded to all questions raised and only those relevant are responded to below. We do not intend to repeat our previous representations rather reinforce key points and respond directly to those relevant matters raised by the Inspector.

- 1.2. For information, Bellway Homes owns the former Newlands School site in Seaford and is imminently due to submit a reserved matters application for 183 homes pursuant to the extant outline planning permission ref: LW/16/0800.

2. Matter 3: Housing

Does the Plan deliver the total housing provision set out in Part 1 of the Plan to meet the needs of the Plan area over the plan period in accordance with national policy?

3.1 New Homes Quantum

(i) The quantum of new homes provided for over the plan period (as set out in Table 3) appears to accord with the growth requirements as set out in Spatial Policy 1 in Part 1 of the Local Plan, i.e. meeting the residual requirement of the District outside the National Park of 1,660 dwellings. Do any parties wish to comment on the justification and effectiveness of the figures in Table 3?

2.1. The former Newlands School site has outline planning permission for 183 homes and is included as a windfall site within Table 3. It is not allocated as a residential site within the Plan nor is it allocated within the emerging Seaford Neighbourhood Plan. Table 3 includes 200 net additional dwellings in locations ‘to be determined’. The 183 dwellings granted outline permission have been taken by the Council to contribute to this 200 dwelling requirement. Given that housing requirements are a minimum target as specified in the NPPF and the Core Strategy, it is surprising LDC propose that the deliverable number of new homes at this site is taken from the 200 unit requirement “to be determined” in alternative locations. The site is a known site, with a reliable source of new homes coming forward. Surely, to ensure the Plan is flexible going forward, this 200 unit windfall allowance should be retained and the Newlands School site should be allocated as a secure source of delivery. Such an approach would be positive by ensuring that the Plan presents a strategy which as a minimum seeks to address the housing needs of the area, is justified in terms of evidence to support the allocation of the site, and effective in delivering new homes during the early stages of the Plan. As set out in the NPPF, these requirements must be met in order for the Plan to be found sound.

(ii) Is there enough flexibility of housing land supply in the Plan over the plan period to ensure that the housing requirement in the plan area will be met in full? If the Plan is found to be insufficiently flexible in this regard, what further steps should the Council take to rectify this?

- 2.2. The Plan requires sufficient flexibility to adapt to change and to ensure that any delay in the production of Neighbourhood Plans does not prevent housing needs from being met in any given area, particularly in the short term. We consider that paragraph 2.6 of the Plan is therefore incorrect in stating that the Plan is only required to identify housing growth “in the remaining settlements” where Neighbourhood Plans are not being progressed.
- 2.3. Bellway Homes is committed to the site and is imminently due to submit the reserved matters application for the scheme. However, in order to ensure that the Plan includes sufficient flexibility and is most effective at securing the much needed housing delivery over the plan period, the site should be allocated to reflect the outline planning permission. This would ensure that, notwithstanding Bellway’s commitment, the 183 additional dwelling will be delivered on a site which, as evidenced by the outline planning permission, is deemed to be suitable for a residential development of this scale. Adopting this approach and allocating the site will help to ensure that the Plan is effective and justified as required by the NPPF paragraph 35.

3.2 Distribution of New Homes

(i) Does the proposed residual distribution of new homes (also set out in table 4.1) accord with the principles of sustainable development, and the parameters as set out in policy Spatial Policy 2 of the Local Plan Part 1, including taking account of considerations such as: the proportion of new housing planned for urban areas/most sustainable settlements; proximity to employment, sustainable transport and community facilities; and adverse impact on areas/zones of environmental importance?

- 2.4. Table 4 includes the 183 homes under the ‘to be determined’ heading. The former Newlands School site is a brownfield, sustainable and accessible site located within the existing settlement boundary. Given this location, employment, public transport and community facilities are easily accessible. The outline planning permission demonstrated that the redevelopment of the site, to include the retention of the existing main school building and the provision of a large area of open space, including a sports pitch, would not result in any adverse impact, amongst others, on heritage assets and ecology.

2.5. Full details are included within the supporting documents to the outline planning permission. The allocation of this site would therefore accord with the principles of sustainable development.

(ii) Does the total of 200 dwellings ‘to be determined’ in Table 3 refer to windfall sites, rural exception sites in Table 2 or from other sources? How are these figures reconciled?

2.6. The majority of this 200 dwelling requirement will be met by the provision of 183 dwellings at the former Newlands School. Given that this is a commitment by virtue of the outline planning permission, it should be allocated as such in the Local Plan Part 2. This will provide certainty that these homes will be delivered. The 200 dwelling requirement should be retained to ensure the Council can meet their minimum housing targets and retain flexibility in order for the Plan to respond to changing circumstances. The reliance on this site to meet a significant proportion of this need could be jeopardised should there be unforeseen circumstances affecting the delivery of the planning permission. This approach, including the allocation of the site, would help to demonstrate that the Plan is positively prepared and sufficiently flexible to adapt to change, as required by the NPPF.

3.3 Housing Delivery

(iii) Is the reliance in the Plan on Neighbourhood Plans (NPs) to deliver 75% of the residual need (1,250 dwellings) realistic? A brief progress note, outlining the housing allocations in each NP, the take up of these allocations to date and the realistic prospects for development during the remainder of the plan period, would be helpful.

2.7. In relation to Seaford, the Plan is overly reliant on the delivery of sites identified within the emerging Neighbourhood Plan, particularly as limited weight can be attached to the NP at this stage, in accordance with the NPPF.

2.8. The allocation of the former Newlands School site for 183 homes, consistent with the outline permission, would ensure the delivery of these homes. Whilst LDC is clearly trying to support local decision and Plan making, there is nothing in the NPPF or PPG that preclude additional sites from being allocated in areas where a NP is progressing but not made. This approach would assist in ensuring that the Plan is not overly reliant on emerging Neighbourhood Plans.

2.9. Bellway Homes is committed to delivering this site early in the Plan Period; however the allocation of the site would protect the long term delivery of 183 homes should unforeseen circumstances arise.

(v) Additional sites: Bearing in mind the above considerations, and the requirement of paragraphs 47[2] and [3] of the Framework, should the Plan identify an increased number of specific, deliverable sites in the form of housing allocations?

2.10. As set out above the allocation of the former Newlands School site should be included within the Plan given that it has an existing outline planning permission and would provide certainty for the delivery of 183 units within Seaford that are not reliant on the Neighbourhood Plan coming forward. The allocation should reflect the outline permission for 183 homes and be included for delivery within the first five years of the Plan Period. The site comprises previously developed land and is sustainably and accessibly located within the existing settlement boundary. Bellway Homes is committed to delivery with the imminent submission of the reserved matters application.

(vi) Has an allowance been made for non-delivery of planning permissions, and if so, what is it?

2.11. The reliance on the outline planning permission does not ensure that the delivery of 183 units at the former Newlands School site will come forward. The Council recognises the importance of this sustainable site to contributing a large number of homes to delivering their housing target by including it within the 200 units 'to be determined', but perversely does not secure this through an allocation.

- 2.12. As set out previously, Bellway Homes is committed to the early delivery of the homes; however flexibility should be built into the Plan to ensure it can change and adapt to unforeseen circumstances. Given the reliance on the 183 homes coming forward to meet the 200 dwellings in locations ‘to be determined’, it would be appropriate, justified and effective, to allocate the site within the Plan, ensuring the principle of development and delivery is protected. The 200 homes in locations ‘to be determined’ should be retained to ensure flexibility in the Plan and to make allowance for the potential non-delivery of other planning permissions. This approach will help to demonstrate that the Plan is positively prepared and effective.

