

Sat 9<sup>th</sup> March 2019

M Fox, Planning Inspector  
(c/o C Banks, Programme Officer)

Dear Sir,

**Lewes District Plan Part 2: SADM**

I refer to your Matter/Issue/Question **3.3 (iii) & (v)**, specifically as it applies to Paras **2.39 & 2.40** of the Plan.

My primary concerns are as follows:

***The Plan is incomplete, and therefore unsound, in that it relies far too heavily on Local Neighbourhood Plans (LNPs) which are not yet prepared, thereby taking a serious risk of substantial under-delivery of the established housing requirement.***

***Further, such reliance on LNPs is likely to undermine any effective coordination across Lewes District and with neighbouring Districts.***

As a specific example, the LNP for Peacehaven & Telscombe has not yet emerged even in draft/consultation form, even though the area was approved/designated for such a plan in 2013.

Nothing is expected for many months, even by those responsible for its preparation, and I am mindful of the long history of resistance by the local authorities to development in P&T over several decades (the strategic site at Lower Hoddern Farm was not included in their original proposals but was inserted at the insistence of the Inspector of Part 1).

I am therefore concerned that an effective LNP may never actually appear, leaving a substantial “hole” in the District Plan, despite the clear and urgent housing demand, both established and projected (ie. growing due to population growth and demographic changes in the surrounding area).

***As a result of the “P&T hole” (and, of course, there are others), Part 2 is not positively prepared – it is seriously incomplete/unsound and LDC need to take back the responsibility for its completion and get it done.***

A range of potential sites has been identified (including, for example, Valley Road, N. Peacehaven) which provide the capacity to meet the requirement, with some “headroom” for future growth, though traffic issues would need to be addressed (these too have been shirked over many years). *[Note that such traffic issues must now be addressed anyway, alongside the development of the strategic site at Lower Hoddern Farm, and this will require more rigorous traffic analysis and more imaginative solutions than seem to have been the case hitherto.]*

Yours sincerely,

F A Perris