

LEWES DISTRICT LOCAL PLAN PART 2: SITE ALLOCATIONS AND
DEVELOPMENT MANAGEMENT POLICIES DPD

REGULATION 22(d) STATEMENT OF REPRESENTATIONS

Volume 6

Non Policy-specific Representations

Peacehaven & Telscombe

Representation References: HSA

Representation ID: REP/340/HSA

Representor Details:

Representor ID:	REP/340
Name:	Tony Perris
Organisation:	
Consultation Body:	General
Stakeholder Type:	Developer/Landowner

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Peacehaven & Telscombe
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: Peacehaven & Telscombe councils have a long history of trying to avoid housing development, despite the urgent need and the obvious local opportunities, including brown-field sites. The Neighbourhood Plan activity is simply their latest strategy for further delays (look how long ago they registered to prepare such a plan and how recently they started any meaningful work). It has also proved difficult to establish contact and participate in any of their activities. They have had plenty long enough to	

develop this plan, at least to the consultation/pre-submission stage - LDC should "firmly encourage" those involved to accelerate their activities, so that the whole district plan can be viewed as an integrated whole! Looking at bits of it in isolation is very likely to lead to bad overall decisions?

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Non Policy-specific Representations

Edge of Burgess Hill (within Wivelsfield Parish)

Representation References: HSA

Representation ID: REP/020/BH02
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Representor Details:

Representor ID:	REP/020
Name:	Lois Partridge
Organisation:	Mid Sussex District Council
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	lois.partridge@midsussex.gov.uk
Address:	Oaklands Road Haywards Heath E Sussex RH16 1ss

Representation:

Policy/Section:	Edge of Burgess Hill (within Wivelsfield Parish)
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
BH02 (Land at Oakfields, Theobalds Road)	
Mid Sussex District Council welcomes the removal of the draft allocation of Land at Oakfields, Theobalds Road, Burgess Hill which was in the previous version of the Plan.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Contact:

Councillor Andrew MacNaughton Tel: 01293 522817
email: andrew.macnaughton@midsussex.gov.uk

Your Ref:

Our Ref: AMN/LP

Date:

5th November 2018

BY EMAIL

Dear Sir/Madam,

**Lewes District Local Plan Part 2: Site Allocations and Development Management Policies
Pre-Submission Document September 2018**

Mid Sussex District Council (MSDC) welcomes the opportunity to comment on the Lewes District Plan Part 2 Pre-Submission document ('the Plan'). The Council has a number of comments it wishes to make.

Planned Housing Growth

Spatial Policy 2 of the Joint Core Strategy Lewes District Local Plan Part 1 identified that provision would be made for 6,900 new homes in Lewes District between 2010 and 2030. Provision was made for 1,073 units through strategic allocations, with 2,216 units built or committed as at 1 April 2015, and supply from windfall and rural exceptions sites allowance of 545 units.

MSDC notes that the residual housing requirement to be provided in the Plan is 1,660 units. However, the Plan only allocates sites to meet 432 units of that residual need, with the other 1,250 units to be delivered from made and emerging Neighbourhood Plans. MSDC has concerns with this approach.

Of the 1,250 homes identified in the Plan which are anticipated to be delivered from Neighbourhood Plans, a total of 865 units are identified in the Newhaven, Peacehaven and Telscombe and Seaford Neighbourhood Plans. These plans are still emerging, and are at a relatively early stage of their preparation.

Peacehaven and Telscombe have only this year carried out a Call for Sites, Seaford has not yet consulted on its Regulation 14 draft Plan, and Newhaven Town Council has not yet consulted on its Regulation 16 draft Plan. As such, the allocation of sites through these plans has not been tested through the Examination process, nor approved through a referendum.

It is acknowledged that Lewes District Council (LDC) commits to closely monitor the progress of the Neighbourhood Plans, and has set out a mechanism to review the Council's approach to Neighbourhood Planning, if any concerns arise regarding timings.

Paragraph 2.16 of the Plan notes that LDC will consider what, if any, measures are needed to resolve the issue. These might include LDC recovering the role of identifying allocations through a subsequent development plan document or a future review of the Local Plan.

Working together for a better Mid Sussex



This would have been a pragmatic approach, if all the Neighbourhood Plans were already 'made'. However, as several of the Neighbourhood Plans on which the Plan relies to deliver housing are not yet close to this stage, there is a significant risk that they may not deliver the required housing, and a further risk that if the housing does come forward, it will not be delivered by 2030, the end of the Plan period.

MSDC notes the requirements of the NPPF, paragraph 23 of which states that:

'Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.'

MSDC questions whether the reliance on emerging Neighbourhood Plans represents a clear strategy for bringing sufficient land forward, to deliver the strategic priorities of the area.

Lewes District Council is therefore encouraged to identify further sites to allocate for housing through the Plan preparation process, to remove the uncertainty of delivery associated with as yet untested, draft Neighbourhood Plans. This approach will seek to ensure that there is minimum unmet need within Lewes District, and that neighbouring authorities are not asked to review whether they are able to meet this unmet need.

Policy BHO1 (Land at The Nuggets, Valebridge Road)

Policy BH01 allocates land at The Nuggets for 14 homes, which is proposed to be accessed through the property 'Woodreeves'. The site lies immediately adjacent to the border with Mid Sussex District, with the proposed access to the site from land in Mid Sussex District.

In response to Lewes District Council's previous, Regulation 18 consultation on the draft Site Allocations and Development Management Policies document, MSDC noted that the policy should acknowledge the impact of the proposed development on services and facilities provided in Mid Sussex District, due to the proximity of the development to the district boundary. This is particularly relevant now, as there is a current planning application for 25 homes on this site, rather than the 14 units set out in the draft allocation.

It is disappointing to note that, while paragraph 2.47 of the supporting text to Policy BH01 notes that the proposed access for the site lies within the county of West Sussex, the text and the policy still do not acknowledge that the shops, services and public transport provision which will support the new residents of the development lie within Mid Sussex District.

As set out in our previous response, in line with the spatial strategy set out in our District Plan Burgess Hill is subject to a major growth programme for 5,000 new homes, and 25 hectares of employment land along with associated infrastructure. MSDC is working closely with service and infrastructure providers to ensure that the corresponding social, community and highways infrastructure is provided in a timely manner to support this strategic development.

MSDC will be responding to future Lewes District Council 'Community Infrastructure Levy Window for Bidding' to ensure that development on the border with Mid Sussex makes a proportional contribution to the impact that the development will have on local services and facilities.

BH02 (Land at Oakfields, Theobalds Road)

Mid Sussex District Council welcomes the removal of the draft allocation of Land at Oakfields, Theobalds Road, Burgess Hill which was in the previous version of the Plan.

Gypsy and Traveller Provision

MSDC welcomes the inclusion of the proposed allocation of Land south of the Plough for 5 additional permanent Gypsy and Traveller pitches in Policy GT01, and notes that this allocation meets the need identified in the Gypsy and Traveller Accommodation Assessment, 2015, for Lewes District outside of the National Park, over the Plan period.

Policy DM1: Planning Boundary

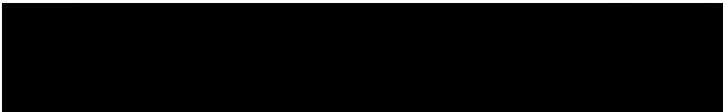
MSDC welcomes the fact that the Planning Boundary on the Plan's Policies Map, Inset Map 11 – Edge of Burgess Hill, has been amended since the previous consultation, to exclude land east of Valebridge Road, which is not allocated for development. This will help to ensure that this land is protected as open countryside, and will help to deter speculative development in this area.

Habitats Regulations Assessment (HRA)

The District Council remains committed to co-operating with the other affected local authorities through the Ashdown Forest Officer Working Group and looks forward to working in partnership to protect the Ashdown Forest SAC in an appropriate manner.

If you would like to discuss any of these comments, please contact Alice Henstock, Senior Planning Policy Officer, alice.henstock@midsussex.gov.uk

Yours sincerely,



Councillor Andrew MacNaughton
Cabinet Member for Housing and Planning

Non Policy-specific Representations

South Chailey

Representation References: HSA

Representation ID: REP/025/HSARepresentor Details:

Representor ID:	REP/025
Name:	Stephen Treharne
Organisation:	Chailey Parish Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	chaileypc@btconnect.com
Address:	

Representation:

Policy/Section:	South Chailey
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
Representation: Page 43 Change heading 'South Chailey' where it appears above paragraph 2.99 to a sub-heading in small bold letters Paragraph 2.99 Delete the entire paragraph Paragraph 2.100 Delete the entire paragraph Paragraph 2.101 In line 4, replace 'village' with 'settlement' Paragraph 2.102 Delete the entire paragraph Paragraph 2.103 In line 7, replace 'village' with 'settlement'	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?	No
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Why do you feel it is necessary to participate at the Examination in Public?



Chailey Parish Council

Submissions by Chailey Parish Council by way of response to the consultation request by Lewes District Council on the Pre-Submission version of the Lewes District Local Plan Part 2 (“the Draft Plan”)

Chailey Parish Council has two submissions which are (1) the Draft Plan incorrectly treats Chailey as if it were two parishes called North Chailey and South Chailey when it is in fact and in law one parish, and (2) the Draft Plan makes no mention of the type of dwelling that is needed in Chailey.

1. Chailey is one parish and not two

Whilst Chailey does have two principal settlements (which are referred to as North and South Chailey), Chailey is one Parish. The Draft Plan should, as it appears to do for most if not all other Parishes, reflect local government boundaries and Lewes DC’s own recent Area Designation for the Neighbourhood Plan and treat Chailey as one parish and not two. Chailey Parish Council feels most strongly that the Draft Plan should characterise Chailey accurately as a unit embracing both North and South Chailey as well as the other settlements in the civil parish.

The Draft Plan, at pages 36 to 46 and paragraphs 2.81 to 2.109, divides Chailey into two distinct and separate areas, North and South Chailey. The wording under the headings North Chailey (starting on page 36) and South Chailey (starting on page 43) is in some respects confusing in that some refers to North or South Chailey and some to the whole of Chailey Parish. In addition, the artificial division of the parish into two parts results in repetitive wording and unnecessary paragraphs.

To correct the above, and to ensure that the Draft Plan reflects the true position and is consistent, the following changes should be made:

Existing reference	Proposed changes
Page 36	Change the heading “North Chailey” where it appears above paragraph 2.81 to “Chailey”
Paragraph 2.81	Remove the full stop at the end and add “and 10 additional dwellings within the settlement of South Chailey.”
Paragraph 2.81	Re-number as paragraph 2.83 and move
Paragraph 2.84	In lines 2 and 3 remove “South Street.....to the south” and replace with “North Chailey, South Chailey, Chailey Green and South Street”.
Paragraph 2.84	In line 3, remove the word “North”
Paragraph 2.84	In line 4, after Haywards Heath, insert “and Lewes”
Paragraph 2.84	In line 6, delete “The village is classified as a Local Village” and replace with “North and South Chailey are classified as Local Villages”
Paragraph 2.84	Re-number as paragraph 2.81 and move
Paragraph 2.83	In line 5, replace “village” with “settlement”
Paragraph 2.83	Re-number as paragraph 2.84 and move
Page 36/37	Above existing paragraph 2.83 (now re-numbered to 2.84), insert new sub-heading in small bold letters “North Chailey”

Paragraph 2.86	In lines 4 and 5, replace “is under construction” with “construction is completed”
Paragraph 2.86	In line 6, replace “will contribute” with “contributes”
Paragraph 2.96	In line 1 replace “village” with “settlement”
Page 43	Change heading “South Chailey” where it appears above paragraph 2.99 to a sub-heading in small bold letters
Paragraph 2.99	Delete the entire paragraph
Paragraph 2.100	Delete the entire paragraph
Paragraph 2.101	In line 4, replace “village” with “settlement”
Paragraph 2.102	Delete the entire paragraph
Paragraph 2.103	In line 7, replace “village” with “settlement”

2. The nature of the dwellings needed in Chailey

The work done by the Council towards preparing a neighbourhood plan for Chailey (“the Draft NHP”) has included determining the sort of housing that is needed in Chailey. The feedback/results from surveys carried out by the Council and other representations from residents, and from a housing needs survey carried out on behalf of the Council by Lewes DC, are clear and consistent. Chailey is well provided with large multi bedroom dwellings and the need is for smaller more affordable and flexible accommodation.

The Draft NHP incorporates a number of housing policies, including a policy on housing mix. It is proposed that housing developments within the development boundary of Chailey will be permitted where they include a range of house types, including a proportion of one and three bedroom starter homes and sheltered and smaller units for the elderly. Housing developments will also be expected to include an element of single level dwellings and, where practicable, sheltered accommodation to meet the needs of the elderly and people with disabilities, thus enabling them to remain independent and within the community for as long as is possible.

To reflect the intended policy, the following changes should be made to the Draft Plan:

Existing reference	Proposed changes
Paragraph 2.82	In line 2, delete “at the early stages of” and replace with “at an advance stage of”
Paragraph 2.82	In line 5, change “at North Chailey” to “in Chailey”.
Paragraph 2.82	Delete the final sentence “Once the.....applications” and replace with: “Although not allocating sites, the Chailey Neighbourhood Plan will include policies on housing for development within Chailey, and will include a policy on housing mix designed to ensure that any development provides the types of housing that are needed. The Parish Council has identified that there is a clear preference for a proportion of one and three bedroom starter homes and sheltered and smaller units for the elderly. Housing developments will also be expected to include an element of single level dwellings and, where practicable, sheltered accommodation to meet the needs of the elderly and people with disabilities”.

2nd November 2018

Paragraph 2.117

Representation References: HSA


Representation ID: REP/002/HSARepresentor Details:

Representor ID:	REP/002
Name:	Sue Berry
Organisation:	Newick Parish Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	newickpc@newick.net
Address:	

Representation:

Policy/Section:	Paragraph 2.117
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: I have been asked by Newick Parish Council to forward the following comment in connection with the consultation on the Lewes District Local Plan Part 2:- We have no further comments to make, but should point out a typographical error in paragraph 2.117. The reference should be to future review of Plumpton's Neighbourhood Plan, not Newick's.'	

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?
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Why do you feel it is necessary to participate at the Examination in Public?

From: Newick PC Clerk <newickpc@newick.net>
Sent: 31 October 2018 16:35
To: ldf
Subject: Comments from Newick Parish Council on Draft Local Plan Part 2

Categories: LPP2 comment to code - stakeholder details have been added

I have been asked by Newick Parish Council to forward the following comment in connection with the consultation on the Lewes District Local Plan Part 2:-

'We have no further comments to make, but should point out a typographical error in paragraph 2.117. The reference should be to future review of Plumpton's Neighbourhood Plan, not Newick's.'

Regards

Sue Berry

Clerk to Newick Parish Council

01825 722135

This originates from the Parish Clerk and the email and any files transmitted with it may contain confidential information. It is intended solely for the individual or entity to whom it is addressed. If you have received this email in error please notify the sender immediately and delete the email from your inbox.

Data Protection - Any personal information such as name, postal address, telephone number and email address given to Newick Parish Council will only be used to respond to your communication and will not be disclosed to any third party without your prior permission or unless we are required to do so by law.

Representation ID: REP/015/HSARepresentor Details:

Representor ID:	REP/015
Name:	Catherine Jackson
Organisation:	Plumpton Parish Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	catherine.jackson@plumptonpc.co.uk
Address:	

Representation:

Policy/Section:	Paragraph 2.117
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: PPC has one minor comment, relating to paragraph 2.117: This paragraph reads: 'Any future planning applications, or potential review of the Newick Neighbourhood Plan which considers housing allocations, will need to take into consideration policies within the adopted development plan.' PPC presumes that the reference to 'Newick Neighbourhood Plan' is a typographical error and should read 'Plumpton Neighbourhood Plan'.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	Yes
Why do you feel it is necessary to participate at the Examination in Public?	

Response to Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD – Pre-Submission version

Plumpton Parish Council

15 October 2018

Plumpton Parish Council (PPC) offers the following consultation responses to Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD – Pre-Submission version (the Part 2 Document):

1. PPC has one minor comment, relating to paragraph 2.117:

This paragraph reads: **‘Any future planning applications, or potential review of the Newick Neighbourhood Plan which considers housing allocations, will need to take into consideration policies within the adopted development plan.’**

PPC presumes that the reference to ‘Newick Neighbourhood Plan’ is a typographical error and should read ‘Plumpton Neighbourhood Plan’.

2. PPC has major comments on Policy GT01 – Land south of The Plough.

2.1 PPC recognises LDC’s obligations under the Government’s national Planning Policy for Traveller Sites (PPTS). We note that paragraph 2.132 introduces this policy, but without reference to which version. Paragraph 2.142 explicitly refers to a 2012 version of this document. PPC understands that the current version is 2015, and our responses refer to that version of the PPTS.

2.2 First, PPC comments that the PPTS explicitly states under Policy A: Using evidence to plan positively and manage development (paragraph 7):

‘In assembling the evidence base necessary to support their planning approach, local planning authorities should:

pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers’ accommodation needs with travellers themselves, their representative bodies and local support groups).’

PPC has had a long, collaborative and successful relationship with LDC throughout the Neighbourhood Planning process. However, Policy GT01 was first communicated to PPC via a meeting on 05/09/18. This is not consistent with ‘early and effective engagement’ with the settled community; there has been very little time for quantitative assessment of Policy GT01 in a consultation period running from 24/09/18 to 04/11/18. It is not in accordance with the introductory aim of the PPTS (i) ‘to reduce tensions between settled and traveller communities in plan-making and planning decisions’ and suggests to us that either there was deliberate concealment of these plans or that the decision to allocate this site was made hastily, without due consideration, which we regard as inappropriate for such a sensitive proposal and when the village community is already having to come to terms with large-scale development within the settlement.

3. Plumpton Neighbourhood Plan

With respect to planning policy, and in the spirit of localisation, comments hereafter are presented with reference to the made Plumpton Parish Neighbourhood Plan (PPNP), the Local Plan, NPPF and PPTS incorporated into that framework, as relevant.

With respect of the PPTS, comments are restricted to those relevant to **Plan-making** as enacted in the Part 2 Document. PPC has concerns about further information received from LDC in respect of PPTS **Decision-taking**, but these are not immediately relevant to this response.

While GT01 specifically addresses the needs of gypsies and travellers, the PPC response reflects the fact that the policy primarily represents an additional new development of five permanent dwellings.

With regard to the made Plumpton Neighbour Plan (PPNP), Policy GT01 is regarded as not in accordance with the following policies:

- Policy 1: Spatial plan for the parish
- Policy 2: New-build environment and design
- Policy 3: Landscape and biodiversity
- Policy 5: New housing
- Policy 6: Local employment
- Policy 7: Plumpton Green Village Centre

The consultation response will deal with these in policy order.

3.1 PPNP Policy 1: Spatial plan for the parish

PPNP Policy 1 states the primary objective:

‘New development proposals within the planning boundary for Plumpton Green (see Map C) will be supported, provided they accord with the other provisions of the PPNP and the development plan for the area.’

LDC retained Policy CT1 aims to resist development outside existing planning boundaries unless it meets certain criteria. Plumpton Green is the only settlement in the parish that has a planning boundary, and the land allocated in Policy GT01 is not within the Plumpton Green planning boundary, or indeed near that boundary (it lies approximately 650m to the north). The ‘certain criteria’ rider of Policy CT1 is covered in subsequent paragraphs.

While it is acknowledged that PPNP Policy 1 would ultimately have to include the Local Plan Part 2 once that is adopted, it was not envisaged that Part 2 would apply additional new development targets to Plumpton, and propose extension of the planning boundary to areas regarded as unsuitable for development in respect of Local Plan Part 1 policies.

The parish of Plumpton is rural, and comprises two distinct characteristics:

- Plumpton Green – a Service Village where new development should be sited
- Plumpton — a Hamlet where no development should be sited.

While some regard the hamlet as only existing to the south of the Parish, and largely within the South Downs National Park (SDNP), it is clearly identifiable on Policies Map Inset Map 8 Plumpton Green that the character of the parish to the northern boundary is very similar to that of the

southern hamlet, and that is reflected in PPNP Policy 1. We therefore regard this as an unsuitable area to site permanent dwellings, in which category we include static caravans.

The choice of site also does not meet LDC Core Policy 3 – Gypsy and Traveller Accommodation, which sets the objectives:

‘To deliver the homes and accommodation for the needs of the district and ensure the housing growth requirements are accommodated in the most sustainable way’, and

‘To maximise opportunities for re-using suitable previously developed land and to plan for new development in the highly sustainable locations without adversely affecting the character of the area.’

On the first objective, we do not regard the proposed site as sufficiently sustainable by virtue of its likely impact on local employment, discussed below under PPNP Policy 6.

On the second objective, the proposed site is greenfield and we regard its development as adversely changing the character of the area by replacing arable land with residential development, in addition to the previously discussed spatial plan issues.

In addition, the site cannot be regarded as highly sustainable in respect of CP3 policy statement 2:

‘The site is well related to, or has reasonable access to settlements with existing services and facilities such as schools, health services and shops.’

Accordingly, the site would not score well under the sustainability assessment criteria applied under PPNP Policy 1 for the selection of sites (Soc/3: Promote walking and cycling and other forms of sustainable transport with the aim of reducing the need to travel by car), as it is approximately 650m outside the existing planning boundary (which represents the 800m recommended maximum distance limit for walking), and completely lacks safe pedestrian access, as residents must walk along a national speed limit minor road to reach the village amenities, including the primary school and shop.

LDC asserts that this aspect of sustainability can be adequately met by providing a footpath north to the nearest bus stop at The Plough. This relies on a bus service that is currently under threat and therefore cannot be guaranteed in the near future (PPC is unsure whether the provisions of the Bus Services Act 2017 will provide any protection against the deficit in funding for ESCC and LDC).

Accordingly, the choice of site for GT01 also appears not to confidently address the responsibility within the PPTS under Policy B: Planning for travellers sites (13 c) to ‘ensure that children can attend school on a regular basis’.

The proposed site is also in conflict with LDC Core Policy 10 – Natural Environment and Landscape Character. This states the Key Strategic Objectives as:

‘To conserve and enhance the natural beauty, wildlife and cultural heritage of the area’ and

‘To conserve and enhance the high quality and character of the district’s towns, villages, and rural environment by ensuring that all forms of new development are designed to a high standard and maintain and enhance the local vernacular and “sense of place” of individual settlements.’

The proposal is to erect a toilet block of unspecified dimensions, plus hardstanding for up to 10 caravans (static and mobile) plus cars for each pitch's residents. Accordingly, we consider the choice of site for GT01 does not adequately address the responsibility within the PPTS under Policy B: Planning for travellers sites (10 e) to 'protect local amenity and environment'.

Finally, the assessment in the 2018 SHLAA shows this site 03PL as 'Fails proximity Assessment' and regarded as undevelopable for residential development. LDC has subsequently documented (in its presentation to parishioners at the PPC meeting of 09/10/18) that the proximity criteria for residential development will need to be adapted to gypsy and traveller accommodation. At the same presentation, it was stated that the site is not regarded as suitable for traditional residential housing development and would be extremely unlikely to receive planning permission, even if GT01 was implemented.

PPC questions under what planning statute LDC is applying a different test of suitability. This appears contrary to PPTS Policy B: Planning for travellers sites (11), which states: 'Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers whilst respecting the interest of the settled community.' It appears potentially discriminatory, as a lower threshold would seem to apply to the proposed gypsy and traveller residents than to residents of permanent, brick-built housing, especially when there is still uncertainty as to whether the site will be used for gypsies and travellers with protected characteristics under English law, or whether it is available to all travellers as under the definition of 'gypsies and travellers' under PPTS Annexe 1.

3.2 PPNP Policy 2: New-build environment and design

PPNP policy 2 states:

'New development should reflect the scale, density, massing, landscape design and material of surrounding buildings, having regard to the Plumpton Design Statement.'

Five permanent dwellings in the form of static caravans, together with five mobile caravans (as stated at the meeting with LDC of 09/10/18), are entirely out of keeping with the rural hamlet nature of the site.

3.3 PPNP Policy 3: Landscape and biodiversity

PPNP policy 3 states:

'Layout and landscape schemes of new development should be informed by the landscape character of the area.'

Principle 3 supports the retention and, where possible, enhancement of existing green corridors, ponds and other wildlife features. GT01 impinges on a prominent green corridor used by wildlife, including deer.

3.4 PPNP Policy 5: New housing

PPNP Policy 5 states:

'Residential development will be supported on the sites allocated in Neighbourhood Plan Policies 5.1 to 5.4 inclusive, and on suitable windfall sites within Plumpton Green.'

We do not regard the site proposed in GT01 as suitable as it would not qualify under PPNP Policy 1 (and LDC CT1, SP3 etc), as stated previously (para 3.1).

3.5 PPNP Policy 6: Local employment

PPNP Policy 6 states:

‘New development proposals that result in the loss of an existing employment or business use will be resisted, unless it can be demonstrated that its continued use is no longer viable.’

This policy conforms to NPPF paragraph 28 (especially bullet point 4) and aligns to the JCS policy E1 (point (i)), which reflects NPPF paragraphs 18–20 and is designed to secure the future of the existing employment uses within the parish and plan for their growth to serve parish needs.

PPNP Policy 6 also records under paragraph 5.67:

‘Comments made during the consultation events made it clear that parishioners wished to see existing businesses preserved as far as possible and that they had no wish to see Plumpton become a dormitory community.’

There are significant concerns regarding the direct and indirect employment implications of Policy GT01. There are 3 major employers in the parish:

- Plumpton College – an outstanding rural education centre covering 2500 acres, predominantly within the SDNP, specialising in land-based courses
- Plumpton Racecourse – a National Hunt racecourse to the south of Plumpton Green that saw its first race in 1884
- The Old Brickworks – a light industrial business park to the north of Plumpton Green and directly adjacent to the site proposed in GT01.

Of the three, the Old Brickworks is the only one in the northern section of the parish. It comprises 21 businesses on what was formerly a brownfield site. These businesses between them employ in excess of 50 permanent employees, many of whom live in or locally to Plumpton. The businesses are categorised as ‘quiet, non-industrial businesses’, and the site is well respected and supported within the parish.

The Old Brickworks conforms to the principles of NPPF (July 2018): ‘Supporting a prosperous rural economy’, as set out in paragraph 84. It is outside existing settlements, and not well served by public transport, but is on previously developed land and is sensitive to its surroundings.

The businesses at the site contribute significantly to the local and regional economy through business rates, employment and use of local amenities and other businesses such as the village shop (and post office) and local public houses - the Plough immediately to north of the site proposed in GT01, the Fountain in Plumpton Green, and The Half Moon to the south of the parish.

GT01 proposes to locate the site directly adjacent to the Old Brickworks, with no meaningful separation between the two. The businesses of the Old Brickworks have made it clear that they chose the site because of its quiet, rural location and existing ‘soft security’ and that their continued use of it is dependent on those conditions continuing. They have all stated that any kind of development adjacent to the boundary could result in re-location of their businesses elsewhere, at some cost and inconvenience. They are prompted by concerns about the need for greater security

and potential restriction on current and future operations due to their proximity to residential development.

Even if those businesses remain, or other businesses take their place, the presence of a residential development immediately adjacent to commercial activity is highly likely to result in the need for additional security measures (notably, as a condition of insurance) that will be highly intrusive, such as security fencing and also security lighting in what is 'dark skies' parish where 91% of respondents to one questionnaire informing the PPNP supported preservation dark skies as one of their primary valued aspects of current village life. Dark skies is also a policy of the SDNPA.

The challenges of maintaining public houses in general, and rural ones in particular, is well documented. Plumpton Green has already lost one pub in the past five years.

3.6 PPNP Policy 7: Plumpton Green Village Centre

PPNP Policy 7 states:

'New development proposals requiring planning permission that result in the loss of existing shops or commercial units in the village centre and elsewhere in the parish will be resisted, unless it can be demonstrated that their continued use is no longer viable.'

It further states in paragraph 5.68:

'Over the past 25 years the centre of Plumpton Green has lost one general store, one public house and a garage to housing. The remaining businesses in the village centre, in particular the village shop/post office, are important to the community as a whole but especially to residents without their own transport, as public transport services are limited. Development proposals that might negatively affect the remaining facilities and businesses will be resisted.'

While it is acknowledged that GT01 does not in itself mandate the loss of the businesses located at the Old Brickworks, the real threat of loss exists, based on the same concerns as under PPNP Policy 6 discussed above. The income arising from the occupants of the new development is unlikely to offset the likely loss in custom from the departing businesses.

Accordingly, the choice of site for GT01 does not appear to adequately address the wider responsibility within the PPTS under Policy B: Planning for travellers sites (13) to 'ensure that traveller sites are sustainable economically'.

Non Policy-specific Representations

Plumpton Green

Representation References: HSA

Representation ID: REP/057/HSA

Representor Details:

Representor ID:	REP/057
Name:	Polly Beaumont
Organisation:	1955
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Plumpton Green
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Consistent with national policy
Representation: re: 2.117 - I do not understand how a review of Newick Neighbourhood Plan impacts the Plumpton Parish Plan. I fear this is an error	

What changes do you suggest to make the document legally compliant or sound?

delete policy GT01

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/058/HSA

Representor Details:

Representor ID:	REP/058
Name:	Nicholas Beaumont
Organisation:	1955
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Plumpton Green
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
	Not Positively Prepared
	Not Justified
	Not Consistent with national policy
Representation:	
<p>The reference to Newick Neighbourhood Plan in paragraph 2.117 is, I assume, an error. The error suggests an attitude prevalent in policy GT01 which disregards the Plumpton Parish Neighbourhood Plan and is symptomatic of the haste and lack of thought given to</p>	

the preparation of this document.

What changes do you suggest to make the document legally compliant or sound?

Remove policy GT01 which is badly flawed (see comments on Policy GT01) and respect the policies of the Plumpton Parish Neighbourhood Plan and respect the residents who supported the plan by a large majority on 8th March 2018.

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Non Policy-specific Representations

Ringmer and Broyle Side

Representation References: HSA

Representation ID: REP/224/HSARepresentor Details:

Representor ID:	REP/224
Name:	Peter Home
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Ringmer and Broyle Side
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Effective
Representation: I am unsure of Legal Compliance so have clicked the No box as the document does not allow a N/A option as It should do. I am not a lawyer simply a resident. 1 - Covenants. I am unsure of the impact of the covenants on the land on Anchor Field. The Covenants shown on the Land Registry for title ESX235414 that has the address	

Ringmer Football Field, Ringmer, Lewes and whose land shows as covering the majority of the proposed site has a number of restrictive covenants. Has the plan taken account of such covenants and if so in which manner. These should be included in the document for legal clarity.

2 - Density. The density is much higher than the local Ringmer housing. The plan does not detail how this number is achieved (given the 2003 figure was as per the document 60) and residents will be concerned if the plans use accommodation that is not fitting with the current housing styles (e.g. maximum 2 storey, houses with gardens and not apartments) or do not provide sufficient parking facilities. The promotion of walking, cycling and Bus use will not preclude the ownership of cars given that:

- Commuters cannot rely upon buses to get to areas of employment given the time taken for such journeys E.g. Tunbridge Wells is 30 mins by car 1 hr 45 mins by Bus (to arrive by 8:30 a.m.).
- Cycling is usually only achievable by younger people, without accompanying young children.

There is limited parking available in the centre of Ringmer already. Cars are parked in front of houses in the area and a number of spaces set for access to the shops are blocked out for long periods by people who cannot park elsewhere. Any failure to provide adequate car parking in any new development would exacerbate the current issues as would the removal of the garages shown on the plan.

3 - Playing Fields. The map shows that the playing fields are included in the plans, without details as to any new facilities. The loss of any play area in the middle of the village would reduce the quality of current and future residents. The details should be included in this document.

What changes do you suggest to make the document legally compliant or sound?

Explain how the increased density is met without affecting current Ringmer house styles.

State what the housing styles are expected to be

State what off road car parking for new and current housing will be

Explain in detail the continuing provision of pla

Do you consider it necessary to participate at the Examination in Public?

Yes

Why do you feel it is necessary to participate at the Examination in Public?

I am unsure as to whether I need or wish to be involved as have not explained what this process is. Examination in public? What is this?

As I cannot search the whole document electronically to find out the meaning I cannot answer this question.

Non Policy-specific Representations

Wivelsfield Green

Representation References: HSA

Representation ID: REP/224/HSARepresentor Details:

Representor ID:	REP/224
Name:	Peter Home
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Ringmer and Broyle Side
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Effective
Representation: I am unsure of Legal Compliance so have clicked the No box as the document does not allow a N/A option as It should do. I am not a lawyer simply a resident. 1 - Covenants. I am unsure of the impact of the covenants on the land on Anchor Field. The Covenants shown on the Land Registry for title ESX235414 that has the address	

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- Commuters cannot rely upon buses to get to areas of employment given the time taken for such journeys E.g. Tunbridge Wells is 30 mins by car 1 hr 45 mins by Bus (to arrive by 8:30 a.m.).
- Cycling is usually only achievable by younger people, without accompanying young children.

There is limited parking available in the centre of Ringmer already. Cars are parked in front of houses in the area and a number of spaces set for access to the shops are blocked out for long periods by people who cannot park elsewhere. Any failure to provide adequate car parking in any new development would exacerbate the current issues as would the removal of the garages shown on the plan.

3 - Playing Fields. The map shows that the playing fields are included in the plans, without details as to any new facilities. The loss of any play area in the middle of the village would reduce the quality of current and future residents. The details should be included in this document.

What changes do you suggest to make the document legally compliant or sound?

Explain how the increased density is met without affecting current Ringmer house styles.

State what the housing styles are expected to be

State what off road car parking for new and current housing will be

Explain in detail the continuing provision of playing areas.

Also explain why the proposal provides more housing than that demanded. The section explaining this is not well written and is confusing.

Explain why the Local Highway authority has decided that the increased number of properties can be catered for when previously they allowed for a lower maximum number.

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

I am unsure as to whether I need or wish to be involved as have not explained what this

process is. Examination in public? What is this?

As I cannot search the whole document electronically to find out the meaning I cannot answer this question.

Representation ID: REP/454/HSA/B

Representor Details:

Representor ID:	REP/454
Name:	Robin Walker
Organisation:	Theobalds Road Residents' Association
Consultation Body:	General
Stakeholder Type:	Residents Association

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Wivelsfield Green
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Positively Prepared
Representation: The WNP also includes the Springfield Industrial estate, a brownfield site that is variously identified as undeliverable on SHELAA, available in WNP and is under final planning approval. development now. The totals from "Wivelsfield village" do not seem to include the ~30 houses here.	

What changes do you suggest to make the document legally compliant or sound?

WNP must be updated, and re-adopted by REP.

Do you consider it necessary to participate at the Examination in Public?	Yes
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Why do you feel it is necessary to participate at the Examination in Public?

LDC should be legally challenged on their plans

Employment Site Allocations

Representation References: ESA

Representation ID: REP/007/ESA

Representor Details:

Representor ID:	REP/007
Name:	Karen Crowhurst
Organisation:	Ringmer Parish Council
Consultation Body:	Specific
Stakeholder Type:	Parish Council

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	clerk.ringmerparishcouncil@btconnect.com
Address:	Parish Office Ringmer Village Hall, Lewes Road Ringmer East Sussex BN8 5QH

Representation:

Policy/Section:	Employment Site Allocations
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation:	
Section 3. Employment	
<p>"We are disappointed that there is no reference in this section to the additional rural employment allocations made in the employment-led Ringmer Neighbourhood Plan (adopted in 2016), and to the successful new developments already achieved that demonstrate the viability of additional rural employment in the District. We regard</p>	

additional local employment as central to a flourishing rural economy, which we hope will increase sustainability by increasing local employment options.

'While we support policies DM9, DM10 & DM11, we would wish to see a much more strongly proactive approach to rural employment opportunities in section 3.

'Policies DM15 & DM16 Outdoor & Children's Playing Space

'While we are pleased that standards are set for the provision of outdoor recreational space in Policy DM15, we are concerned that there is no matching analysis of the extent to which these standards are or are not met in the different communities in the District.

'We believe there to be a shortage of sports pitches in Ringmer, so are concerned to see that saved policy RG3 is proposed for abolition in Appendix 2, when we believe this site is still very much needed.

'We also believe Ringmer to have a particular shortage of accessible countryside, and are concerned that there is no recognition of this need anywhere in the Local Plan part 2.

'We consider that policy DM16 is far too prescriptive. There is no need to provide formal children's play space on developments as small as 20 homes, if they are within range of better play facilities provided centrally by the local community. The regular inspection and safe maintenance of such facilities is likely to be beyond the skills of, and unreasonably burdensome to, small residents' associations. We recently experienced a ridiculous situation where a large (110-unit) Ringmer development that was within a few yards of the main children's play area on Ringmer Green was required by officers to provide its own separate play area, that would have been accessible to the whole community but maintained only by the new residents. This would have been a recipe for neighbourhood disputes and a potential source of danger to children. As an absolute minimum this policy should permit a developer to negotiate a contribution to the local community facilities as an alternative to direct provision.

'Proposals map for Ringmer

'The new Broyleside planning boundary drawn on the proposals map appears to be intended to follow the outline of the new allocations for development at Lower Lodge Farm made in the Ringmer Neighbourhood Plan (adopted 2016). However, the outline of the proposed boundary does not appear to follow that of the actual allocations made in the adopted Neighbourhood Plan.

'In most places the proposed new planning boundary around Ringmer village follows the actual boundary of the village housing, including approved new housing. The south-eastern and western boundaries of Ringmer village are also the boundary of the South Downs National Park. However, there are some anomalies and we propose that the boundary should be amended to remove these. We propose that the existing housing at 'Culverden', Norlington Lane; Norlington Fields; and the houses on the south side of Gote Lane and Rushey Green should be included within the new planning boundary.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Spatial Strategy

Representation References: SS

Representation ID: REP/362/SS

Representor Details:

Representor ID:	REP/362
Name:	Sarah Rayfield
Organisation:	British Horse Society
Consultation Body:	General
Stakeholder Type:	Other group or organisation

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	sarah.rayfield@bhs.org.uk
Address:	British Horse Society Abbey Park, Stareton Kenilworth Warwickshire CV8 2XZ

Representation:

Policy/Section:	Spatial Strategy
<p><i>Do you consider the document to be:</i></p> <p>Legally Compliant:</p> <p>Sound:</p>	
<p>Representation:</p> <p>Further to our correspondence in April of this year, please find below comments relating to the current consultation regarding the above in respect of the plan's provision for equestrians within the plan.</p> <p>You will be aware that equestrian access is limited to just 22% of the public rights of way network nationally (significantly less for carriage drivers) and even this figure is</p>	

somewhat misleading as much of it is fragmented, resulting in dead-end bridleways or restricted byways. Increased traffic on roads which puts the most vulnerable road users at still more risk at a time when the limited off road access they have is being threatened by development. It is within the scope of each local plan to provide, not just for walkers and cyclists, but also for equestrians at no additional cost, simply by recording paths as "bridleways" rather than cycleways or footpaths.

Policies contained within the National Planning Policy Framework which support our requests are as follows:

Section 91c of 'Promoting Healthy and Safe Communities':

"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:[...]enable and support healthy lifestyles, especially where this would address identified local health and well-being needs"

Section 96 of 'Open Space & Recreation':

"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision."

Incorporating the requirement to actively seek every opportunity to create new links and/or new circular routes within Lewes DC area for ALL non motorised users, including equestrians would help support the policies above.

Within the local plan we welcome the Council's acknowledgement that,

"4.23 Horse riding and other equestrian activities are increasingly popular forms of recreation in the countryside that can complement agricultural activities and help to diversify rural economies"

We are pleased to note that you recognise equestrianism as an increasingly popular form of exercise. Within an area such as Lewes DC, a good, connected, well maintained rights of way network at the higher status will also result in increased equine tourism as can be witnessed by the number of summer camps run at Plumpton College. Worthy of note also is that The British Horse Society operates a "Horses Welcome" scheme where B&Bs can be approved by the BHS for equine tourism. Along with tourism, the cost of keeping a horse was estimated nationally by BETA in 2015 at £3600 pa per horse with costs in the South East being substantially higher (a small survey in West Sussex in 2017 found the spend was between £4k and £15k pa). Much of this benefits the local economy as it is spent on local businesses: livery yards, vets, farriers, saddlers, feed merchants, forage providers, etc. The value of equestrianism should not be overlooked in any development plan.

Finally, I have attached for your interest a document entitled "The health benefits of horse riding in the UK" which explains the key importance of horse riding for physical and emotional wellbeing. This helps explain why including equestrians fulfils

requirements within the NPPF as mentioned above. Some key findings include:

* More than two thirds (68 percent) of questionnaire respondents participate in horse riding and associated activities for 30 minutes or more at least three times a week. Sport England estimate that such a level of sporting activity will help an individual achieve or exceed the government's recommended minimum level of physical activity.

* A range of evidence indicates the vast majority (90 percent plus) of horse riders are female and more than a third (37 percent) of the female riders who took part in the survey were above 45 years of age. Horse riding is especially well placed to play a valuable role in initiatives to encourage increased physical activity amongst women of all ages.

* Amongst the horse riders who took part in the survey, 39 percent had taken no other form of physical activity in the last four weeks. This highlights the importance of riding to these people, who might otherwise be sedentary.

* Horse riders with a long-standing illness or disability who took part in the survey are able to undertake horse riding and associated activities at the same self-reported level of frequency and physical intensity as those without such an illness or disability. The British Horse Society is very happy to advise and be included in any planning with the possibility of inclusion of rights of way.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Patron Her Majesty The Queen

The British Horse Society
Abbey Park,
Stareton,
Kenilworth,
Warwickshire CV8 2XZ

Email enquiry@bhs.org.uk
Website www.bhs.org.uk
Tel 02476 840500
Fax 02476 840501

The logo for The British Horse Society, featuring the text "The British Horse Society" in white, stacked vertically on a red rectangular background.

Bringing Horses and People
Together

Planning Policy Team
Sent via email

2nd November 2018

Dear Sir or Madam

Lewes District Local Plan Part 2

Further to our correspondence in April of this year, please find below comments relating to the current consultation regarding the above in respect of the plan's provision for equestrians within the plan.

You will be aware that equestrian access is limited to just 22% of the public rights of way network nationally (significantly less for carriage drivers) and even this figure is somewhat misleading as much of it is fragmented, resulting in dead-end bridleways or restricted byways. Increased traffic on roads which puts the most vulnerable road users at still more risk at a time when the limited off road access they have is being threatened by development. It is within the scope of each local plan to provide, not just for walkers and cyclists, but also for equestrians at no additional cost, simply by recording paths as "bridleways" rather than cycleways or footpaths.

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Section 96 of 'Open Space & Recreation':

"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision."

Incorporating the requirement to actively seek every opportunity to create new links and/or new circular routes within Lewes DC area for ALL non motorised users, *including equestrians* would help support the policies above.

Within the local plan we welcome the Council's acknowledgement that,

"4.23 Horse riding and other equestrian activities are increasingly popular forms of recreation in the countryside that can complement agricultural activities and help to diversify rural economies"

Further comment on the benefits of equestrian activities both to the equestrian and the economy are detailed towards the end of this letter.

Specific observations on the document policies are below:

Policy BH01 - Land at The Nuggets, Valebridge Road

Point 1 *"Access, including provision for pedestrians and cyclists, to be provided from Valebridge Road"* needs "equestrians" including in this provision. Existing bridleways should not be used as 'private access' for these developments or alternative provision of new publicly maintainable rights of way of adequate amenity and convenience should be supplied in their place for all users.

Policies BA01, BA02, Barcombe Cross

Point 1 *"Access, including provision for pedestrians and cyclists..."* "equestrians" should be added in to this provision.

Policy DM6

1. *"Commercial riding schools, livery stables and other commercial facilities should have satisfactory access to the public bridleway network without the use of unsuitable roads."*

"Unsuitable roads" is subjective, even amongst equestrians, and this needs clarification with the relevant parties.

Policy DM9: Farm Diversification

"4. The proposed development would not create an unacceptable impact on the local road network or require highway improvements that would harm the landscape or ecological value of rural roads in the area."

Priority should be given to schemes where additional off road access for ALL vulnerable road users would be provided as a result of such schemes via dedicated bridleways and/or long term permissive routes.

Policy DM14: Multi-functional Green Infrastructure

"Development will be permitted where opportunities for the provision of additional green infrastructure have been fully considered and would be provided where justified by the character of the area or the need for outdoor playing space."

Provision of public rights of way (for ALL NMUs) should be included within this policy as it fulfils NPPF section 91c and 96.

Policy DM15: Provision for Outdoor Playing Space

"The Council will seek to achieve provision of outdoor playing space, which is as a matter of practise and policy available for public use, to the following minimum standards:

1.6 ha per 1000 population for outdoor sports, including playing pitches, tennis courts, and bowling greens;"

Within the UK, there are 2.7 million horse riders compared with approximately 0.4 million tennis players and 0.4 million bowls players. We would suggest that the need for equestrian access vastly exceeds the requirement for further tennis courts and bowling greens and so should be given, at the very least, equal consideration.

DM17 – Former Lewes/Sheffield Park Railway Line

"Development which would prejudice such uses will not be permitted unless proposals are accompanied by alternative route provision."

We support this and propose that this should extend to **all** development, not just the specific project mentioned.

However, of concern is the phrase above the policy in section 4.57:

"The Council will therefore encourage opportunities to increase access to the countryside by enabling the provision of a footpath, cycleway or bridleway along the undeveloped part of the former line."

This sentence must be amended to

"The Council will therefore encourage opportunities to increase access to the countryside by enabling the provision of a *bridleway/restricted byway* along the undeveloped part of the former line."

This provides for equestrians, cyclists AND walkers whereas "footpath, cycleway or bridleway" excludes equestrians from at least two of the options.

DM35 – we welcome the inclusion of this policy but would further comment that bridleways over which there is currently limited private vehicular access ought not to be used as access routes for *further* development. Where it is possible that unofficial use of the public right of way could happen then steps should be taken wherever possible to prevent this in the form of vehicle barriers and/or the provision of alternative routes of equal value and amenity.

We are pleased to note that you recognise equestrianism as an increasingly popular form of exercise. Within an area such as Lewes DC, a good, connected, well maintained rights of way network at the higher status will also result in increased equine tourism as can be witnessed by the number of summer camps run at Plumpton College. Worthy of note also is that The British Horse Society operates a "Horses Welcome" scheme where B&Bs can be approved by the BHS for equine tourism. Along with tourism, the cost of keeping a horse was estimated nationally by BETA in 2015 at £3600 pa per horse with costs in the South East being substantially higher (a small survey in West Sussex in 2017 found the spend was between £4k and £15k pa). Much of this benefits the local economy as it is spent on local businesses: livery yards, vets, farriers, saddlers, feed merchants, forage providers, etc. The value of equestrianism should not be overlooked in any development plan.

Finally, I have attached for your interest a document entitled "The health benefits of horse riding in the UK" which explains the key importance of horse riding for physical and emotional wellbeing. This helps explain why including equestrians fulfils requirements within the NPPF as mentioned above. Some key findings include:

- More than two thirds (68 percent) of questionnaire respondents participate in horse riding and associated activities for 30 minutes or more at least three times a week. *Sport England estimate that such a level of sporting activity will help an individual achieve or exceed the government's recommended minimum level of physical activity.*
- A range of evidence indicates the vast majority (90 percent plus) of horse riders are female and more than a third (37 percent) of the female riders who took part in the survey were above 45 years of age. *Horse riding is especially well placed to play a valuable role in initiatives to encourage increased physical activity amongst women of all ages.*

- Amongst the horse riders who took part in the survey, *39 percent had taken no other form of physical activity in the last four weeks. This highlights the importance of riding to these people, who might otherwise be sedentary.*
- Horse riders with a long-standing illness or disability who took part in the survey are able to undertake horse riding and associated activities *at the same self-reported level of frequency and physical intensity as those without such an illness or disability.*

The British Horse Society is very happy to advise and be included in any planning with the possibility of inclusion of rights of way.

Yours faithfully



Sarah Rayfield

Access Field Officer – London & the South East

Email: sarah.rayfield@bhs.org.uk

Tel: 02476 840713

Mob: 07971 059262

The health benefits of horse riding in the UK



Research undertaken by the University of Brighton and Plumpton College
on behalf of The British Horse Society

The health benefits of horse riding in the UK

Executive Summary

Key findings

The physical health benefits of horse riding and associated activities

- Horse riding and activities associated with horse riding, such as mucking out, expend sufficient energy to be classed as moderate intensity exercise.
- Regular periods of trotting in a riding session may enhance the energy expended and associated health benefits.
- More than two thirds (68 percent) of questionnaire respondents participate in horse riding and associated activities for 30 minutes or more at least three times a week. Sport England estimate that such a level of sporting activity will help an individual achieve or exceed the government's recommended minimum level of physical activity.
- A range of evidence indicates the vast majority (90 percent plus) of horse riders are female and more than a third (37 percent) of the female riders who took part in the survey were above 45 years of age. Horse riding is especially well placed to play a valuable role in initiatives to encourage increased physical activity amongst women of all ages.
- Amongst the horse riders who took part in the survey, 39 percent had taken no other form of physical activity in the last four weeks. This highlights the importance of riding to these people, who might otherwise be sedentary.
- Horse riders with a long-standing illness or disability who took part in the survey are able to undertake horse riding and associated activities at the same self-reported level of frequency and physical intensity as those without such an illness or disability.

The psychological and social benefits of horse riding

- Horse riding stimulates mainly positive psychological feelings.
- Horse riders are strongly motivated to take part in riding by the sense of well-being they gain from interacting with horses. This important positive psychological interaction with an animal occurs in a very few sports.
- Being outdoors and in contact with nature is an important motivation for the vast majority of horse riders.

Study methods

The British Horse Society commissioned the University of Brighton in partnership with Plumpton College to research the physical health, psychological and well-being benefits of recreational horse riding in the United Kingdom.

Sport England UK have adopted a threshold value for the contribution of sport to meeting Government guidelines on the recommended intensity and frequency of exercise that is likely to achieve physical health benefits. The threshold value measures the degree to which an individual participates in sport of moderate intensity activity for at least 30 minutes or more, three times a week. The research, therefore, assessed whether horse riding can be classified as a moderate intensity exercise and examined the frequency with which individuals take part

The research also examined the psychological and social benefits of horse riding. Reliable existing evidence indicates that physical exercise produces well-being benefits linked to social interactions and changes in mood, anxiety, self esteem and other personal emotions.

Two scientific exercise testing trials were undertaken to analyse the physical exercise intensity of recreational horse riding using validated scientific measurements of energy expended and current definitions of what constitutes moderate intensity exercise in terms of energy expenditure measured in metabolic equivalents (METs).

The first trial involved 17 participants cycling in a laboratory to assess their aerobic fitness levels. Measurements were also taken of their descriptive anthropometric characteristics. In the second trial the same 17 participants rode a horse for 45 minutes at the Plumpton College equestrian centre following a protocol that replicated the pattern of a typical riding lesson.

A questionnaire survey was undertaken of 1,248 horse riders. The quantitative and qualitative data gathered by the questionnaire allowed an analysis of the respondents' self reported measures of exercise intensity and frequency, and their perceptions of the social and psychological benefits of horse riding.

Physical health benefits

The scientific trials indicated general horse riding energy expenditure was equivalent to 3.7 METs and trotting equated to approximately 5.0 METs. These levels are clearly within the moderate intensity exercise band recommended by the UK's ABC of Physical Activity for Health guidelines that considers moderate intensity to be typically characterized as between three-six METs.

The national compendium of physical activities categorises energy expenditures for different recreational physical activities and reports levels of four METs for general horse riding and 6.5 METs for trotting, which are similar to those obtained in the scientific trials. The compendium also reports that the energy expenditure for saddling and grooming was 3.5 METs which is in the moderate intensity band

More than two thirds (68 percent) of questionnaire respondents achieved the government guidelines for exercise intensity and frequency (30 minutes for three times a week or more at moderate intensity) from horse riding and associated activities alone. Of these respondents 69 percent achieved this level of intensity and frequency through horse riding and the other 21 percent did so through associated activities such as mucking out and grooming.

Women have been identified in government studies as a social group with relatively low levels of participation in physical activity. Some 93 percent of questionnaire respondents were women and 49 percent of female respondents were aged 45 or above. These are comparable figures to a major Sport England survey which found that 90 percent of those participating in equestrianism are women and 37 percent of the female participants in equestrianism are aged 45 or above. The gender and age profile of equestrianism is not matched by any other sport in the UK.

Thirty nine percent of questionnaire respondents indicated that horse riding was the only form of physical activity in which they had participated during the last four weeks. These respondents, if they did not ride, would be sedentary people unless they changed their exercise habits, thus stressing the importance of horse riding for these individuals.

Qualitative data obtained in the questionnaire suggests that for some respondents with long-standing illnesses or disability, horse riding had actually improved their physical or mental condition.

Psychological and social benefits

More than 80 percent of questionnaire respondents reported that horse riding made them feel 'quite a lot' or 'extremely' cheerful, relaxed, happy or active. Qualitative data suggests that horse riding can play a role in managing negative feelings relating to anxiety and depression. The experience of these psychological benefits amongst questionnaire respondents was not influenced by the frequency of participation in horse riding and most psychological benefits were experienced by riders who did not participate regularly.

Asked to rate different motivations for going horse riding 82 percent of questionnaire respondents rated the motivation of 'interaction with horses' as either 'very important' or 'extremely important'. No other motivation received such a high importance rating. Existing evidence suggests that companion animals can provide owners with certain psychological benefits. These findings suggest that the interaction with horses may be very positive psychologically for horse riders.

More than 80 percent of questionnaire respondents rated the motivations 'contact with nature' and 'scenery and views' 'important', 'very important' or 'extremely important'. Some personal development motivations identified as important by respondents included 'escape', 'develop skills', 'challenge myself', 'experience excitement', 'to be physically active' and 'to relax'. Participation in horse riding provides a range of psychological and social benefits, some of which are particular to the interaction with animals and nature and therefore would not be gained from other forms of sporting activity.

Non Policy-specific Representations

Protecting and enhancing the distinctive quality of the environment

Representation References: QE

Representation ID: REP/215/QE

Representor Details:

Representor ID:	REP/215
Name:	Pippa Hildick-Smith
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Protecting and enhancing the distinctive quality of the environment
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Positively Prepared Not Justified Not Consistent with national policy
Representation:	There are many areas with diverse wildlife. Theobalds Road ancient bridleway is a route used not just by residents but also by wildlife - foxes, deer and smaller animals. The ancient trees lining the road are home for bats and owls.

'Manor Nursery, a plot untouched for over 30 years was recently completely cleared. Trees felled, stumps ground out, the whole area of land scraped clear by diggers. About three weeks after the clearance the developer instructed an "environmental survey" - well after there would have been ANY remaining evidence of the varied and diverse wildlife present on the plot for years previously.

'I can only imagine that this survey showing "no evidence of wildlife" will be submitted as part of a proposal to develop the land on Manor Nursery for housing development. Not only is the access to this land completely unsuitable for heavy machinery and lorries, but development of a plot in an area of ancient heritage, which was previously home to bats and other wildlife, should not even be considered.

What changes do you suggest to make the document legally compliant or sound?

Identify areas of historic interest - listen to the community regarding this! Such areas need to be protected from housing development, and instead should be promoted as a recreational facility.

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

In order for my point of view to be heard and not ignored

Duty to Co-operate

Representation References: DTC

Representation ID: REP/215/DTC

Representor Details:

Representor ID:	REP/215
Name:	Pippa Hildick-Smith
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Duty to Co-operate
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No
	Not Justified
	Not Consistent with national policy
Representation:	
1.15 states that the only cross-border issues relate to Travellers/. This is not correct. Theobalds Road is a Bridleway which starts in West Sussex (from Valebridge Road) and continues eastward into East Sussex. Any decision made regarding this bridleway is	

therefore obviously a cross-boundary issue. East Sussex cannot and should not be allowed to make decisions for the eastern end of this bridleway without consulting West Sussex authorities. Decisions on Theobalds in the neighbourhood plan appear to be being pushed forward by East Sussex without due regard for this.

What changes do you suggest to make the document legally compliant or sound?

Firstly recognition that Theobalds should be considered a cross-boundary issue.

Secondly that the nature of the ancient Bridleway should be protected, and this means that East Sussex councils should find alternative areas for development.

Do you consider it necessary to participate at the Examination in Public? Yes**Why do you feel it is necessary to participate at the Examination in Public?**

It seems to me that East Sussex, having made a large central area a national park, are now pressing for development on the edges of their area with no regard for the protection these other areas deserve.

I have no confidence that this view will be listened to unless it is lobbied for.

Representation ID: REP/372/DTC

Representor Details:

Representor ID:	REP/372
Name:	Sarah Roberts
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Duty to Co-operate
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Positively Prepared Not Justified Not Effective
Representation:	
LDC's duty to cooperate with Mid Sussex in planning developments on the county boundary at North West Wivelsfield is questionable. CIL seems to be the only area of cooperation or discussion. Strategic co-operation in the planning and delivery of new developments within the region does not go beyond or any deeper than the tolerated	

identification and allocation of controversial on-boundary sites and subsequent CIL payments. When do Mid Sussex and Lewes cooperate to identify and agree the 'types' of residential homes needed (according to statistical forecasts in the changes to our population) in the region and concomitant services and infrastructure in light of the fact that all residents in the North West of Wivelsfield look to Burgess Hill and Mid Sussex District Council to meet their needs.

What changes do you suggest to make the document legally compliant or sound?

A transparent public Statement of Common Ground.

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Representation ID: REP/454/DTCRepresentor Details:

Representor ID:	REP/454
Name:	Robin Walker
Organisation:	Theobalds Road Residents' Association
Consultation Body:	General
Stakeholder Type:	Residents Association

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Duty to Co-operate
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No
Representation: 1.14 the explicit plans (various parcels of land running north along Valebridge Road, including Nuggets, noted previously, which has been approved based primarily on the availability of resources in Burgess Hill), states that the issue of housing provision along the East/West Sussex border 'has been fully scoped and agreed'. Yet when I wrote, both to Mid Sussex District Council, and Lewes District council, via	

email, to ask about LDC's contribution to funding for the additional resources that must be provided by MDC (i.e. paid for by Mid Sussex residents), I received a reply from Mid Sussex that the only mechanism was tendering for a one-off payment from the CIL, whilst from REP, no response at all.

Given the scale of proposed additional building in an area (including the outlined WV06), as well as Nuggets) which will be additional to the extensive growth planned along the 'Northern Arc' within Burgess Hill (which is noted, but the council tax for such developments will go to MSDC and hence fund the resources), this is a significant issue for Mid Sussex council tax payers.

Since no acceptable answer has been forthcoming from MDSC, and no answer at all forthcoming from REP, clearly the statement in 1.14 is incorrect, and thus open to legal challenge and review.

What changes do you suggest to make the document legally compliant or sound?

No evidence of the duty to co-operate has been presented; indeed, quite clearly, the opposite is true from the evidence.

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

As on other topics, LDC cannot be trusted to make sound decisions and I would want to see them publicly challenged.

Sustainability Appraisal

Representation References: SA

Representation ID: REP/050/SARepresentor Details:

Representor ID:	REP/050
Name:	Craig Barnes
Organisation:	Gladman Developments Ltd
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Craig.Barnes@gladman.co.uk
Address:	

Representation:

Policy/Section:	Sustainability Appraisal
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: 4.1.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies that are set out in local plans must be the subject of a Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against all reasonable alternatives. 4.1.2 The Local Plan should ensure that the results of the SA process clearly justify any policy choices that are ultimately made, including the proposed site allocations (or any	

decision not to allocate sites) when considered against 'all reasonable alternatives'. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making and scoring should be robust, justified and transparent.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

**Lewes Local Plan Part 2: Site Allocations and Development
Management Policies Pre-submission Draft
Gladman Representations**



November 2018

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Appendix 1 – Development Brief Land at Barcombe Mills Road, Barcombe Cross

Appendix 2 – Development Brief Land to the West of the A275, South Chailey

1 EXECUTIVE SUMMARY

- i. This submission provides Gladman Developments' written representations to the Pre-submission version of the Lewes Local Plan Part 2 Site Allocations and Development Management Policies Document.
- ii. Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.
- iii. This representation makes comments on the following matters:
 - a. Housing provision
 - b. Allocations in Newhaven (NH01/NH02), Barcombe Cross (BA01/BA03), South Chailey (CH03) and Ringmer (RG01)
 - c. Planning Boundary (Policy DM1)
 - d. Protection of Agricultural Land (Policy DM19)
 - e. Heritage Assets (Policy DM33)
 - f. Site Submissions

2 INTRODUCTION

2.1 Context

- 2.1.1 Gladman Developments Limited (Gladman) specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Development's representations to the pre-submission version of the Lewes Local Plan Part 2 Site Allocations and Development Management Policies (the Part 2 Local Plan).
- 2.1.2 The Part 2 Local Plan is prepared in the context of the Lewes Core Strategy: Local Plan Part 1 (the Part 1 Local Plan) which was adopted by the Council in May 2016. The Part 1 Local Plan provides the strategic and spatial context for planning within the District. The Part 2 Local Plan must therefore be consistent with overall approach of the Part 1 Local Plan and seek to support its full and effective delivery.
- 2.1.3 Since the previous consultation, National Planning Policy has evolved. In July 2018, the Government published an updated National Planning Policy Framework (NPPF2). For plan making NPPF2 will apply for Local Plans submitted to the Secretary of State for examination following the 24th January 2019. Plans submitted ahead of this date will be assessed against the policies of the original NPPF (as published in March 2012). Even for these plans however, it is considered prudent for local planning authorities to take into account the revised policy framework provided by NPPF2 in order to future proof the development plan. In the case of Lewes District, the Part 2 Local Plan is being prepared during this transitional period, and as such, Gladman consider that the Council should have regard to both versions of the NPPF.
- 2.1.4 For the avoidance of doubt, Paragraph 85 of NPPF2 sets out four tests that must be met for Local Plans to be considered sound:
- Positively Prepared – Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - Consistent with National Policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

- 2.1.5 Gladman also notes the significant emphasis directed within NPPF2 to securing the sustainable and full delivery of housing requirements. Amongst other new policy requirements, NPPF2 introduces a new housing delivery test to monitor and measure housing delivery over the plan period, with specific measures outlined for those authorities unable to demonstrate sufficient levels of delivery. The NPPF2 also redefines what sites are considered deliverable, and the level of evidence required to illustrate this.

3 FIXING OUR BROKEN HOUSING MARKET – WHITE PAPER FEBRUARY 2017

3.1 Overview

- 3.1.1 The Government is in no doubt that the housing market in Britain is broken which, according to the Prime Minister, is one of the greatest barriers to progress in the country today.
- 3.1.2 Average house prices are almost eight times average earnings which is an all-time record and soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation.
- 3.1.3 The reason for this crisis is that the country is simply not building enough homes and has not done so for far too long. The consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and to start to tackle years of under-supply.
- 3.1.4 Everyone involved in politics and the housing industry therefore has a moral duty to tackle this issue head on. The White Paper states quite unequivocally that *'the housing shortage isn't a looming crisis, a distant threat that will become a problem if we fail to act. We are already living in it.'*
- 3.1.5 Tackling the housing shortage is not easy. It will inevitably require some tough decisions. The alternative, according to the White Paper, is a divided nation, with an unbridgeable and ever-widening gap between the property haves and have-nots.
- 3.1.6 The challenge of increasing supply cannot be met by Government alone. It is vital to have local leadership and commitment from a wide range of stakeholders, including local authorities, private developers, housing associations, lenders and local communities.
- 3.1.7 The starting point is building more homes. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home and it will also bring the cost of renting down. We need more land for homes where people want to live. All areas therefore need a plan to deal with the housing pressures they face.
- 3.1.8 At the stage at which the White Paper was published, it was identified that over 40 percent of local planning authorities did not have a plan in place to fully meet the projected growth in households in their area. All local authorities should therefore develop up-to-date plans with their communities that meet their housing requirement based upon an honest assessment of the need for new homes.
- 3.1.9 Local planning authorities have a responsibility to do all that they can to meet their housing requirements, even though not every area may be able to do so in full. The identified housing requirement should be accommodated in the Local Plan, unless there are policies elsewhere in the National Planning Policy Framework that provide strong reasons for restricting development, or the adverse impacts of meeting this requirement would significantly and demonstrably outweigh the

benefits. Where an authority has demonstrated that it is unable to meet its entire housing requirement, it must be able to work constructively with neighbouring authorities to ensure that the remainder is met.

- 3.1.10 Plans should be reviewed regularly and are likely to require updating in whole or in part at least every five years. An authority will also need to update its plan if its existing housing target can no longer be justified against its objectively assessed housing requirement.
- 3.1.11 Policies in Local Plans should also allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector including opportunities for SME housebuilders to deliver much needed housing.
- 3.1.12 In terms of rural areas, the Government expects local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to afford to live where they grew up. It is clear that improving both the availability and affordability of homes in rural areas is vital for sustaining rural communities, alongside action to support jobs and services. There are opportunities to go further to support a good mix of sites and meet rural housing needs, especially where scope exists to expand settlements in a way which is sustainable and helps provide homes for local people. This is especially important in those rural areas where a high demand for homes makes the cost of housing a particular challenge for local people.
- 3.1.13 The Government has also made it clear through the White Paper that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.
- 3.1.14 The White Paper is the cornerstone of future Government policy on fixing the broken housing market. It provides the direction of travel the Government is intending to take and is a clear statement that this Government is serious about the provision of the right number of houses in the right places. Local plans therefore need to consider these policy intentions now in order to ensure that they support the Government's agenda and provide the homes that local communities need in the right locations. The implementation of the White Paper has already been triggered through more recent government announcements and in particular the recent consultation on the proposals for a move towards a standardised methodology for calculating housing needs.
- 3.1.15 More recently, in October 2017, the Prime Minister reaffirmed the Government's commitment to addressing the broken housing market by bringing forward measures to boost home ownership and housing supply, stating:

"I will dedicate my premiership to fixing this problem – to restoring hope. To renewing the British Dream for a new generation of people. And that means fixing our broken housing market."

"For 30 or 40 years we simply haven't built enough homes. As a result, prices have risen so much that the average home now costs almost 8 times average earnings. And that's been a disaster for young people in particular."

3.1.16 Furthermore, in a message to housebuilders, the Prime Minister indicated that:

"We, the government, will make sure the land is available. We'll make sure our young people have the skills you need. In return, you must do your duty to Britain and build the homes our country needs."

4 SUSTAINABILITY APPRAISAL

- 4.1.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies that are set out in local plans must be the subject of a Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against all reasonable alternatives.
- 4.1.2 The Local Plan should ensure that the results of the SA process clearly justify any policy choices that are ultimately made, including the proposed site allocations (or any decision not to allocate sites) when considered against 'all reasonable alternatives'. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision making and scoring should be robust, justified and transparent.

5 LEWES LOCAL PLAN PART 2 SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES

5.1 Site Allocations Overall Comments

- 5.1.1 The strategic context for the distribution of housing in the Part 2 Local Plan is set out within policies SP1 and SP2 of the Part 1 Local Plan. Policy SP1 sets out the housing requirement for the plan area with 5,494 dwellings required between 2010 and 2030. Policy SP2 sets out the required distribution of this housing requirement within the Plan area and National Park. Taking into account completed and committed development, Policy SP2 identifies x6 strategic sites with a collective capacity for 1,728 dwellings. Beyond this, further non-strategic growth is identified at various named settlements within the plan area (all expressed as minimum requirements) the balance of which is to be met through the Part 2 Local Plan.
- 5.1.2 In order to meet the housing requirement of the Part 1 Local Plan in full, housing land capacity for a further 1,660 dwellings is identified by the Council as the starting point for the preparation of the Part 2 Local Plan. Further assessment of completions and committed development since April 2015, together with monitoring of provision for new housing outlined within locally prepared Neighbourhood Plans, reduces this residual need to 105 dwellings. In response to this context, the Council has sought to allocate sufficient land to deliver a further 132 dwellings. This provides for a marginal oversupply, however is responsive to the level of development which is required in order to meet each of the identified minimum housing requirements for each settlement as set out in Policy SP2 of the Part 1 Local Plan.
- 5.1.3 In broad terms Gladman welcome the Council's commitment to meet and respond to the minimum targets as identified through both Policy SP1 and SP2 of the Part 1 Local Plan. Ensuring sufficient supply on a settlement by settlement basis as set out in the Part 1 Local Plan, is critical in ensuring that the Part 2 Local Plan is consistent with the strategic approach of the adopted development plan. It will also ensure that housing supply is most responsive to local development needs and provides adequate support of settlement vitality and vibrancy consistent with the Council's spatial strategy.
- 5.1.4 Gladman however, do not believe that there is sufficient flexibility within the supply to ensure that the housing requirement of the plan area will be met in full. Capacity for only 27 dwellings in excess of the minimum housing requirement identified for the District (outside of the National Park) is proposed by the Council through the Part 2 Local Plan. This provides flexibility of just 0.5% in the context of the overall housing requirement. As a result, the Council is hugely reliant on full delivery of all identified and committed sites moving forwards over the plan period. This is inclusive of a windfall allowance of 600 dwellings and rural exceptions sites allowance of 125 dwellings over which the Council has limited influence over. As a result, Gladman conclude that there is a distinct

- possibility that the housing requirement will not be met in full, contrary to Policy SP1 of the Part 1 Local Plan.
- 5.1.5 The allocation of housing land within the Part 2 Local Plan is also made in the context of an acknowledged shortfall in the overall level of housing provision made within the Part 1 Local Plan against objectively assessed housing needs.
- 5.1.6 No means of meeting this shortfall have yet been identified by the Council, and a potential resolution to this shortfall will not occur until the commencement of a future Local Plan Review. In the interim Gladman consider that this context provides the Council with further cause to ensure that housing delivery is maximised through the Part 2 Local Plan.
- 5.1.7 Gladman believes that enhanced delivery within the plan area can be secured by adopting the following two measures.
- 5.1.8 First, is the need to allocate further land through the Part 2 Local Plan. Gladman consider that an additional supply of at least 10% (above the housing requirement) should be planned for (circa 550 dwellings). This approach will provide greater certainty that the minimum requirements of the Local Plan can be met in full. It will also ensure that the Local Plan is more adaptable to change which may be experienced during the plan period. In response, Gladman submit two sites for consideration as allocations for housing through the Part 2 Local Plan (see Section 6 of this representation).
- 5.1.9 Secondly, the Council should adopt a flexible and positive policy framework for the determination of applications submitted on sites which are not allocated for development within the Local Plan. Such a policy would provide scope for proportionate and appropriately scaled development to come forward on sites which are located on unidentified sites beyond the settlement boundary, provided they are well related and adjacent to existing specified settlements, and subject to meeting other local and national planning policy requirements. The adoption of this approach would prove a boost to sustainable housing delivery.
- 5.1.10 Such a policy has been prepared relatively locally by Ashford Council through Policy HOU5 of the Ashford Local Plan 2030 (currently at examination). The policy text (as modified) reads:

“Proposals for residential development adjoining or close to the existing built up confines of [listed] settlements will be acceptable.. provided that each of the following criteria is met:

- a) The scale of development proposed is proportionate to the size of the settlement and the level, type and quality of day to day service provision currently available, and commensurate with the ability of those services to absorb the level of development in combination with any planned allocations in this Local Plan and committed development, in liaison with service providers;***

- b) The site is within easy walking distance of basic day to day services in the nearest settlement, and/or has access to sustainable methods of transport to access a range of services;***
- c) The development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affect the character of the surrounding area;***
- d) The development is located where it is possible to maximise the use of public transport, cycling and walking to access services;***
- e) Conserve and enhance the natural environment and preserve or enhance any heritage assets in the locality; and***
- f) The development (and any associated infrastructure) is of a high-quality design and meets the following requirements:***
 - i) It sits sympathetically within the wider landscape;***
 - ii) It preserves or enhances the setting of the nearest settlement;***
 - iii) It includes an appropriately sized and designed landscape buffer to the open countryside;***
 - iv) It is consistent with local character and built form, including scale, bulk, and the materials used;***
 - v) It does not adversely impact on neighbouring uses or a good standard of amenity for nearby residents;***
 - vi) It would conserve biodiversity interests on the site and/or adjoining area and not adversely affect the integrity of international and national protected sites in line with Policy ENV1.***

5.1.11 Gladman consider that a similar policy should be implemented in the case of Lewes. Safeguards relating to size, location and impacts included within the policy would ensure that the overall spatial strategy as defined in the Part 1 Local Plan would be safeguarded and reflected in decision making when applying the policy. The policy would be beneficial in enabling additional development not otherwise provided by the development plan, ensuring that sustainable housing delivery is maximised within the District.

5.2 Neighbourhood Plans

- 5.2.1 Great emphasis is placed by the Council on securing the delivery of the residual housing requirement through Neighbourhood Planning. Of the residual need for 1,660 dwellings, 1,250 dwellings are identified through the Neighbourhood Planning process (75%). Gladman notes the strong take up of Neighbourhood Plans within the plan area, with 'made' neighbourhood plans in four areas and allocating sites sufficient to deliver 385 dwellings. A further three emerging Neighbourhood Plans would deliver 865 dwellings.
- 5.2.2 Whilst a positive start has been made in Lewes in relation to Neighbourhood Plan making, the Council must recognise the risk associated with reliance on Neighbourhood Plans in securing housing delivery. The Council will need to closely monitor the implementation of Neighbourhood Plans and ensure that the appropriate policy mechanisms are in place should allocated sites not come forward as and when envisaged within the Neighbourhood Plan.

5.3 Newhaven: Policy NH01 and NH02

- 5.3.1 Two previously saved allocations for housing within Newhaven are carried forward through the Local Plan Part 2. Both allocations form part of the committed supply within Newhaven, and as such make an important contribution in meeting the identified housing requirement in full.
- 5.3.2 In our previous representation to the Draft version of the Part 2 Local Plan, Gladman raised concerns relating to the deliverability of both sites. No evidence has been provided by the Council since the conclusion of this consultation which has satisfactorily addressed these concerns.

NH01 – South of Valley Road

- 5.3.3 NH01 is carried forward from the 2003 Local Plan and has a history which extends into the 1970s. Whilst parts of the site have come forward for development over this period, development of the site has been taken at a considerably slow pace, with a further capacity for 24 dwellings yet to be developed. Despite being available and suitable for development for a period of at least 35 years, this part of the Site has thus far not come forward for housing development. No evidence has been produced by the Council to confirm what has altered in the site conditions and market which means that this Site is now likely to be developed.

NH02 - Land at the Marina

- 5.3.4 NH02 is also a previously allocated site and has been subject to a previous and now lapsed planning consent for a mixed-use development which included some 331 dwellings (lapsed in May 2015). Beyond this lapsed planning permission, there is little evidence that the site could be developed for 300 dwellings during the plan period. The Site is subject to multiple constraints and planning issues such as its small area, proximity to heritage assets, active use as a marina, and site pollution issues.

- 5.3.5 Whilst Gladman agrees that the potential exists for some development to come forward over the plan period at both NH01 and NH02, Gladman cannot conclude with any certainty on the extent and timing, which is particularly significant given the absence of flexibility within the wider plan. Gladman consider that this uncertainty further underlines the need for additional allocations and a relaxed policy position as previously set out in Section 5.1 of this representation.

5.4 Barcombe Cross: Policy BA01 and BA03

- 5.4.1 Gladman welcome the Council's decision to allocate land at Barcombe Cross for housing development through the Part 2 Local Plan. This is consistent with Policy SP2 of the Part 1 Local Plan, which identifies the need for Barcombe Cross to accommodate new development within the plan period. Barcombe Cross is a sustainable settlement with a primary school, post office, shop, public house, village hall, and bus services. Further development is necessary to ensure that existing services remain viable and provide a response to the housing needs of the village and its rural hinterland.

- 5.4.2 Whilst housing allocations at Barcombe Cross is supported, Gladman hold concern with the suitability of some of the sites identified by the Council for allocation for housing within the village through the Part 2 Local Plan. Gladman believe that there are more appropriate locations for growth at Barcombe Cross which should be explored first by the Council (see Section 6).

BA01 – Land at Hillside Nurseries, High Street

- 5.4.3 Site BA01 is known to experience access constraints which require third party land in order to be suitably addressed. The 2018 Housing Site Options Background Paper illustrates that there is currently disagreement about the availability of this land as providing the solution for safe and sufficient means of access to the Site. The Paper reveals a dispute on whether an agreement has been reached for this land to be used. The agent of this land disputes the claim that an agreement on this matter has now been reached. It is unclear, whether the Site could be developed without this third-party land.

BA03 – Land at Bridgelands

- 5.4.4 This Site is known to experience surface water flooding issues and currently provides flood water capacity with features such as a pond and ditches. The development of this site may have an adverse effect for flood risk for off-site locations contrary to policy and will require further study before the developability of the Site can be confirmed. The Site is also located within a part of the village which is assessed to have a low capacity for change in landscape terms. As such, even a modest development of the Site could have significant adverse effects for local landscape quality contrary to national planning policy.

5.5 South Chailey: Policy CH03

- 5.5.1 The Council state that a limited level of allocations is made in South Chailey on account of the limited range of services available within the village and the sensitivity of the landscape to development. Gladman dispute the Council's position with regard to the sustainability of the village and its capacity for further development.
- 5.5.2 Gladman consider South Chailey to be a sustainable settlement. The village benefits from various services and facilities such as Chailey School, a GP, church, a playground, and village a shop/post office. The village is served by the 121-bus service which links the village to the nearby higher order settlements of Newick and Lewes. The 121-bus services operates 6 days week (not Sunday) at 2 hourly intervals. The service provides access to both Newick and Lewes during rush hour, affording a viable alternative means of travel for accessing wider services and employment facilities available within these centres.
- 5.5.3 Gladman consider that there are alternative locations for development within South Chailey which are contained from wider long views which have not been explored by the Council (see section 6). Gladman believe that it is important that the Council explore all options available to secure sustainable development within the District, in order to maximise housing delivery in the context of significant housing need and in order to provide greater certainty that the minimum requirements of the Part 1 Local Plan.

5.6 Ringmer: Policy RG01

- 5.6.1 The Part 2 Local Plan seeks to role forward the allocation of Caburn Field for housing from the 2003 Local Plan. The Site is in active use as the home of Ringmer Football Club. The club's owners wish to relocate the club to an alternative site, however, despite being allocated for housing development within the previous local plan, the site has not yet come forward.
- 5.6.2 Policy RG01, like its predecessor, requires the relocation of the football club to an alternative site, ahead of permitting its development for housing. Gladman support this approach, however holds concerns about the deliverability of this when an alternative site has yet to be identified. Gladman is aware that land is identified for playing fields within the made Ringmer Neighbourhood Plan on a site to the east of Ringmer Community College (Site RG3). However, it is clear from the supporting text within the Neighbourhood Plan that this field is required in order to meet existing shortfalls in open space provision. It is unclear whether the football club could be accommodated at this site in addition to the needs identified in the Neighbourhood Plan.
- 5.6.3 Gladman consider that in order to heighten the certainty of this site coming forwards within the plan period, there is a need for the Council, in partnership with the Parish Council, to identify an alternative location for the football club. The demonstrated availability of a suitable alternative would alleviate Gladman's concerns regarding the deliverability of this site.

- 5.6.4 Should this not prove possible, Gladman consider that further allocations and/or greater flexibility in decision making (as set out in Section 5.1 of this representation) should be provided by the Council in order to give greater certainty that the Plan's minimum development requirements will be met in full.

5.7 Policy DM1: Planning Boundary

- 5.7.1 As set out in Section 5.1 of this representation, and further to the concerns raised relating to a number of proposed allocations, Gladman consider that there is a strong case for greater degree of flexibility for the types of development permissible within the open countryside. Policy HOU5 of the Ashford Local Plan (as quoted in Section 5.1), is considered by Gladman to provide an appropriate basis for the rewording of Policy DM1. This approach would secure the delivery of additional sustainable, proportionate development, which is consistent with the spatial strategy, and responsive to identified constraints and issues.
- 5.7.2 Gladman consider that the Policy should be applied to the settlements of Newhaven, Seaford, Peacehaven and Telscombe, Ringer and Broyle Side, Cooksbridge, Barcombe Cross, North and South Chailey, Newick, Plumpton Green, Wivlesfield Green, and areas adjacent to Burgess Hill.

5.8 Policy DM19: Protection of Agricultural Land

- 5.8.1 The policy adopts a sequential approach to the development of best and most versatile agricultural land. This represents a departure from national planning policy where no sequential approach is applied. No evidence is provided by the Council to justify the application of this strict approach.
- 5.8.2 Furthermore, it is unclear how an assessment of alternatives could be undertaken given that only indicative mapping of best and most versatile land is available, and accurate testing can only be undertaken following site investigation. It is also not clear on what basis the alternative assessment will be undertaken (settlement based? Parish based? District based? Etc). As drafted therefore, the policy could not be effectively implemented.
- 5.8.3 In response, Gladman consider that the policy should be reworded. The policy should set out that the development of Best and Most Versatile land should be avoided, and that proposals on best and most versatile land will need to demonstrate that the benefits of that proposal will significantly outweigh the adverse effects of its loss. This is consistent with the approach of the NPPF.

5.9 Policy DM33: Heritage Assets

- 5.9.1 The approach to protecting the historic built environment must fully reflect the guidance set out in NPPF2 paragraphs 184-201.
- 5.9.2 The Policy should ensure that a graded approach to assessing the weight applied to the conservation of the asset depending on the importance of that asset.

-
- 5.9.3 With reference to designated heritage assets, the Council should refer specifically to paragraphs 194 and 195 of NPPF2, which set out the need to assess the significance of a designated heritage assets and where there is less than substantial harm, this should be weighed against the public benefits of the proposal. Where there is deemed to be substantial harm, then the proposal would need to achieve substantial public benefits to outweigh that harm.
- 5.9.4 For non-designated assets, the policy must reflect the guidance set out within paragraph 197 of NPPF2. This states that the policy test that should be applied in these cases is that a balanced judgement should be reached having regard to the scale of any harm and the significance of the heritage asset.

6 SITE SUBMISSIONS

6.1 Land at Barcombe Mills Road, Barcombe Cross

- 6.1.1 Land at Barcombe Hills Road, Barcombe Cross extends to circa 3.7 hectares. The parcel of land is well related to the existing pattern of the settlement and its release for development would form a suitable, sustainable extension to Barcombe Cross. A significant amount of additional land is within the same ownership and has the potential to be used for additional community benefit.
- 6.1.2 The development brief for the Site is again submitted to the Council in Appendix 1. The development brief illustrates how the site could be developed, however this is not fixed, and Gladman is flexible to change subject to further discussion with the Council and the local community.
- 6.1.3 It is considered that this site has the capacity to deliver 50-70 dwellings and could provide for a mix of house types and needs. The scale of development is proportionate to the size of Barcombe Cross and could make an important contribution to the District's housing land supply.
- 6.1.4 Development in this location would be deliverable in the short term and increase the supply and choice of housing, including affordable housing, in Barcombe Cross and the wider area. In addition, it would contribute towards economic growth and have wider social benefits to the local community.

6.2 Land to the West of the A275, South Chailey

- 6.2.1 As set out in Section 5.5 of this representation, Gladman considers that South Chailey has a good level of services and facilities and as such forms a sustainable location for new development. Gladman propose that land to the west of the A275, South Chailey (see development brief at Appendix 2) is allocated for residential development.
- 6.2.2 The site extends to 2.6 hectares and is well related to the existing built environment of South Chailey, as well as being well contained by existing woodland and a public right of way. The site would be capable of delivering circa 55 dwellings as well as improvements to pedestrian links and a new play area.
- 6.2.3 This development, as proposed, clearly constitutes 'sustainable development', and is viable and deliverable and should be considered as a potential housing allocation.
- 6.2.4 This proposal would be deliverable in the short term and increase the supply and choice of housing, including affordable housing, in South Chailey and the wider area. In addition, it would contribute towards economic growth and have wider social benefits to the local community.
- 6.2.5 Gladman would welcome the opportunity to discuss the potential of the site further with both the District Council and the local community.

7 CONCLUSION

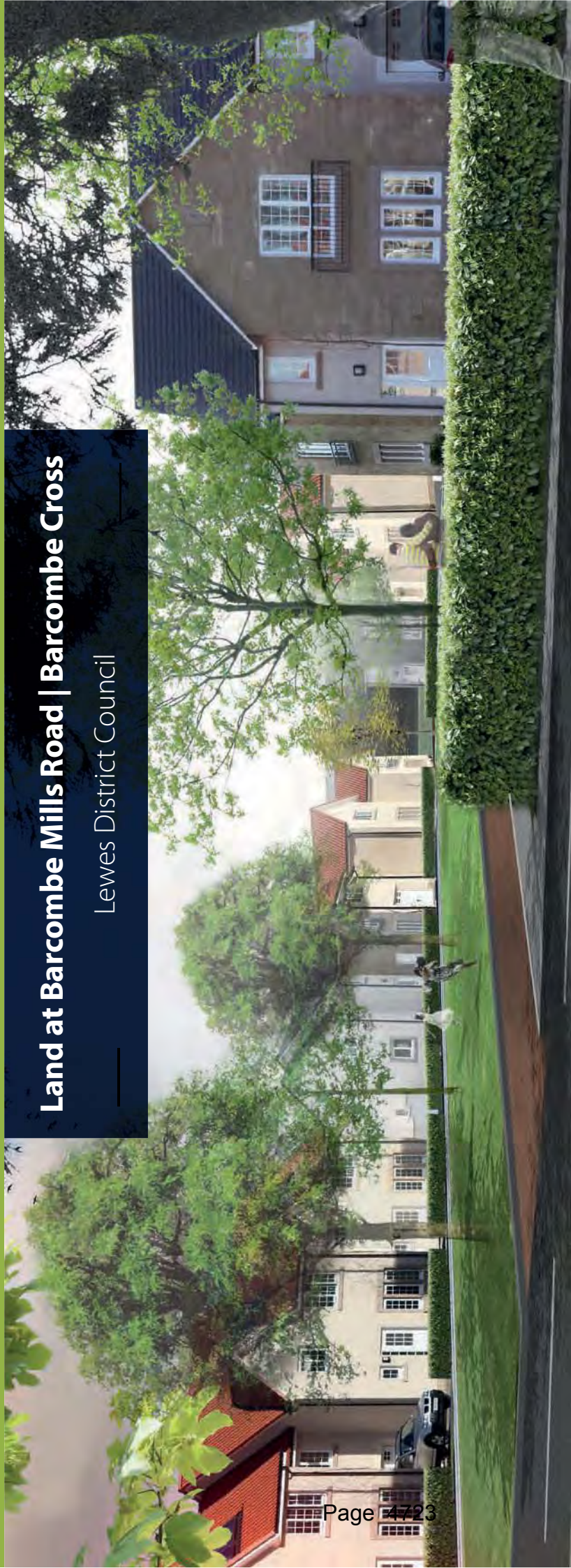
- 7.1.1 This submission has provided Gladman Developments' written representations to the pre-submission version of the Lewes Local Plan Part 2.
- 7.1.2 Gladman hold significant concerns that the approach adopted by the Council in its allocation of housing land through the Part 2 Local Plan risks the deliverability of the housing requirement. The Council is reliant on the full delivery of committed and allocated sites, as well as other sources of land such as windfall development and rural exception housing to meet its housing requirement, with minimal flexibility provided. As such, there is a high degree of risk that the full minimum housing requirement as set out in the Part 1 Local Plan will not being achieved.
- 7.1.3 To address this, Gladman consider that further allocations are necessary. Gladman also consider that the Council should adopt a flexible approach to the determination of applications which are submitted on sites which are located beyond but adjacent to existing settlement boundaries. Gladman submit the wording of Policy HOU5 as amended within the emerging Ashford Local Plan as an exemplar policy for the Council's consideration. Gladman has also identified the settlements located within the plan area at which this policy could be sustainably implemented.
- 7.1.4 Gladman maintain their concerns regarding the deliverability of a number of allocations proposed through the Part 2 Local Plan which have not been addressed by the Council since the previous consultation. Gladman consider that the deliverability issues highlighted within this representation provides a further case for additional allocations to be made through the Part 2 Local Plan and for greater flexibility to be implemented by the Council in decision making as highlighted above.
- 7.1.5 In response, Gladman has submitted two sites for consideration as allocations for housing, at Barcombe Mills Road, Barcombe Cross and west of the A275, South Chailey. Both sites are considered by Gladman to provide for suitable locations for housing, and both are deliverable within the remaining plan period.
- 7.1.6 Beyond this, Gladman has concerns with the soundness of the proposed policy approach outlined in relation to Best and Most Versatile Land and Heritage and has suggested suitable amends to both policies.

Appendix 1

Development Brief - Land at Barcombe Mills Road, Barcombe Cross

DEVELOPMENT BRIEF

Land at Barcombe Mills Road | Barcombe Cross
Lewes District Council



Introduction

Gladman Developments Ltd wishes to promote land at Barcombe Mills Road, Barcombe Cross for development. The 3.7 hectare proposed development site (identified by the red line boundary) presents an ideal opportunity to create a sustainable, high quality residential development situated in a sought-after location whilst responding to the existing landscape context and nearby heritage assets.

A new residential development on this site would incorporate both new market and affordable housing of a variety of types and tenures, to help meet the current and future housing needs of Barcombe Cross and the District.

This document includes an initial indicative framework plan, indicating how the site might accommodate a future residential development with high quality open space and landscaping. This will complement the site's surroundings to achieve seamless integration.

The indicative framework plan is, of course, just our first attempt at considering the development potential of the site. Gladman would welcome the opportunity to discuss the potential delivery of this site with you in more detail so it can be considered fully in the preparation of your emerging Local Plan Part 2.

Should you wish to further discuss our proposals, please contact:
Planner: Laura Tilston
Email: l.tilston@gladman.co.uk
Telephone: 01260 288925



Site & Planning Context

Site & Surroundings

The village of Barcombe Cross is located approximately 3.5 miles north of Lewes town and 4.5 miles south west of Uckfield.

The site is located to the south of Barcombe Cross, to the west of Barcombe Mills Road and is approximately 3.7 hectares in size. The site is immediately adjacent to existing residential development on Monger's Mead to the north.

As can be seen on the aerial view of the site on the previous page, the land identified by the red line boundary is the proposed development site, with the remaining land under the landowner's control identified by the blue boundary, which will be retained as agricultural land. It is anticipated that the majority of the site would provide for residential development, with the remainder comprising green infrastructure and public open space.

A Vibrant Community

Barcombe Cross is a vibrant settlement with a population of 741 according to the 2011 Census.

Barcombe Cross is an active and successful community and provides residents with direct access to community facilities including:

- Barcombe Primary School
- Post Office and Store
- Royal Oak Public House
- Bus links to Cooksbridge and Lewes
- Village Hall

Barcombe Cross is well placed to host additional development to meet future housing need and support future economic growth. Spatial Policy 2 of the Core Strategy identifies that a minimum of 30 additional units are to come forward within the settlement across the plan period.

Principle of Development

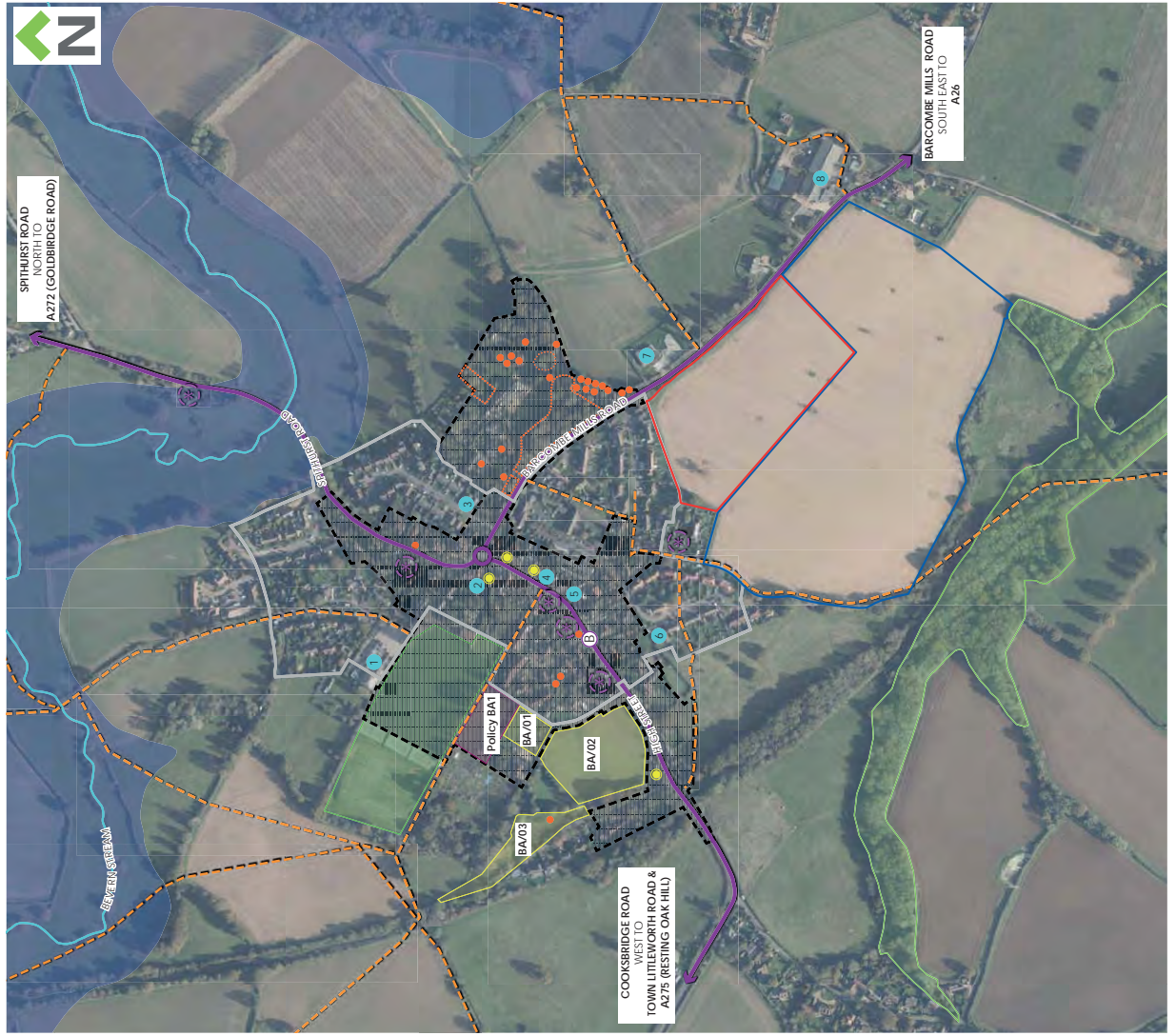
The Full Objectively Assessed Housing Need for Lewes District cannot be met due to constraints across the area such as the South Downs National Park. Therefore, further opportunities to deliver appropriate and sustainable sites for housing development will be very important for local people to meet existing housing need. Barcombe Cross is a settlement that is relatively free from constraints (such as the national park) and therefore is an appropriate location for housing growth.

The emerging Local Plan Part 2: Site Allocations and Development Management Policies proposes to allocate 3 sites for residential development in Barcombe Cross, providing 38 dwellings across the plan period. Gladman believe that Barcombe Cross is capable of supporting further growth beyond the amount currently proposed within the emerging Local Plan, and housing development need not be limited to this amount.

It must be noted that two of the proposed allocations for Barcombe Cross comprise developments of fewer than 11 dwellings. Therefore, the threshold for on-site affordable housing provision as set out in adopted Core Policy 1 will not apply and there will be no policy requirement for affordable housing on these sites. New residential development on land off Barcombe Mills Road will provide the full policy compliant amount of affordable housing on-site, which should be seen as a considerable benefit of the proposals.

Settlement Constraints Plan

This plan identifies the constraints to development across the settlement, including ancient and semi-natural woodland, tree preservation orders, the Barcombe Cross Conservation Area and listed buildings. As can be seen from the plan, the site itself is free from planning constraints.



Site Development Potential

This site offers a unique opportunity for Lewes District Council to plan, and more importantly deliver, a new development where people will genuinely want to live and choose to stay, whilst embracing the distinctive character of the surrounding area. This will be achieved by:

Housing Delivery



The site is capable of delivering approximately 50 dwellings of varying sizes, types and tenures (including affordable housing delivered in accordance with planning policy).

Delivery



Gladman considers that housing on this site is capable of being brought forward within the next 5 years.

Landscape Character



The site is not designated for its environmental value, and does not feature any landscape features which would elevate it above that of the open countryside in which it sits. The site can be developed in such a way to retain and positively manage any key landscape features and to provide substantial areas of structural planting to act as a landscape buffer, as identified on the indicative framework plan within this development brief.

The village hall on the opposite side of Barcombe Mills Road and the footpath connection to the existing residential area to the northwest would link the site to the existing fabric of Barcombe Cross. Through sensitive design, the development of the site can be absorbed into the wider landscape without causing any unacceptable landscape and visual harm.

Site Development Potential

Biodiversity, Green Infrastructure & Local Wildlife



The proposed development will aim to enhance the environment through the provision of green infrastructure, comprising new publically accessible greenspace and recreational paths increasing permeability to surrounding areas of interest and facilities.

Ecology surveys will be undertaken prior to the determination of the planning application and work will also be carried out to assess any impact on nearby ecological designations. The development proposals will provide adequate mitigation as required to ensure species are protected, with enhancement where possible.

Hydrology



The development proposal falls entirely within the Environment Agency Flood Risk Zone 1 i.e. land assessed as having a less than 1 in 1,000 annual probability of flooding. The site is also not within a surface water flood risk area.

Heritage



The site is located in close proximity to Monger's Farmhouse, a grade II listed building. Having sought advice from heritage consultants at Pegasus, we understand the immediate setting of the listed building and the converted barn to the south has changed considerably as they were once a farmstead set a little distance apart from Barcombe Cross, however recent residential development has joined the farmstead to the settlement to its west and north. Monger's Farm is no longer used for farming and its character has changed completely to residential with the former farmyard now being in use for parking and gardens. This change to character has diminished the contribution of the wider agricultural setting to its significance.

The proposed development is set back from the heritage asset in this area, and the site has been selected to retain agricultural land directly to the south to minimise any adverse impact to the setting of the listed building. The site is well screened from other listed buildings and the conservation area within the village and will be carefully designed to integrate with existing development.

Site Development Potential

Design



A design-led approach, informed by consultation with the District Council, key stakeholders and the local community, would inform plans for the site so that a future development responds sensitively to the site's village and landscape setting. The development would make a positive addition to Barcombe Cross, complementing the character of the surrounding area in terms of scale, density, character and quality.

Accessibility



Development in this location will provide quality pedestrian, cycle and public transport connections with Barcombe Cross and the wider highway and footpath / cycle network. The site fronts directly onto land in the adopted highway so a vehicular access is achievable. The nearest bus stop is located around 350m from the centre of the site and can be reached by an accessible footpath.

Topography



The land within the red line boundary is flat with no technical barriers to overcome in order to secure its development.

Socio-economic



Our preliminary research shows that the proposed development could lead to a significant boost in local spending and there is an indication that the gross spending power of the new residents could be in excess of £1.6 million each year, a proportion of which will be spent in the locality.

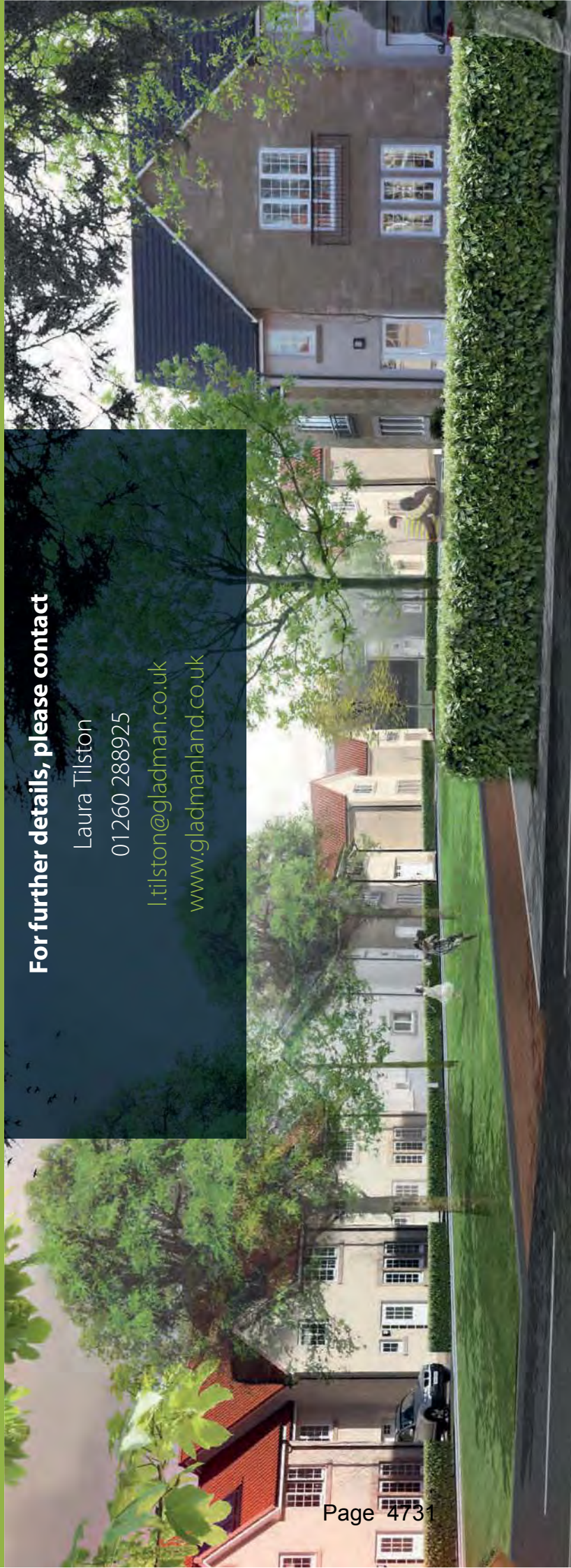




Gladman Land
Gladman House, Alexandria Way,
Congleton, CW12 1LB

For further details, please contact

Laura Tilston
01260 288925
l.tilston@gladman.co.uk
www.gladmanland.co.uk



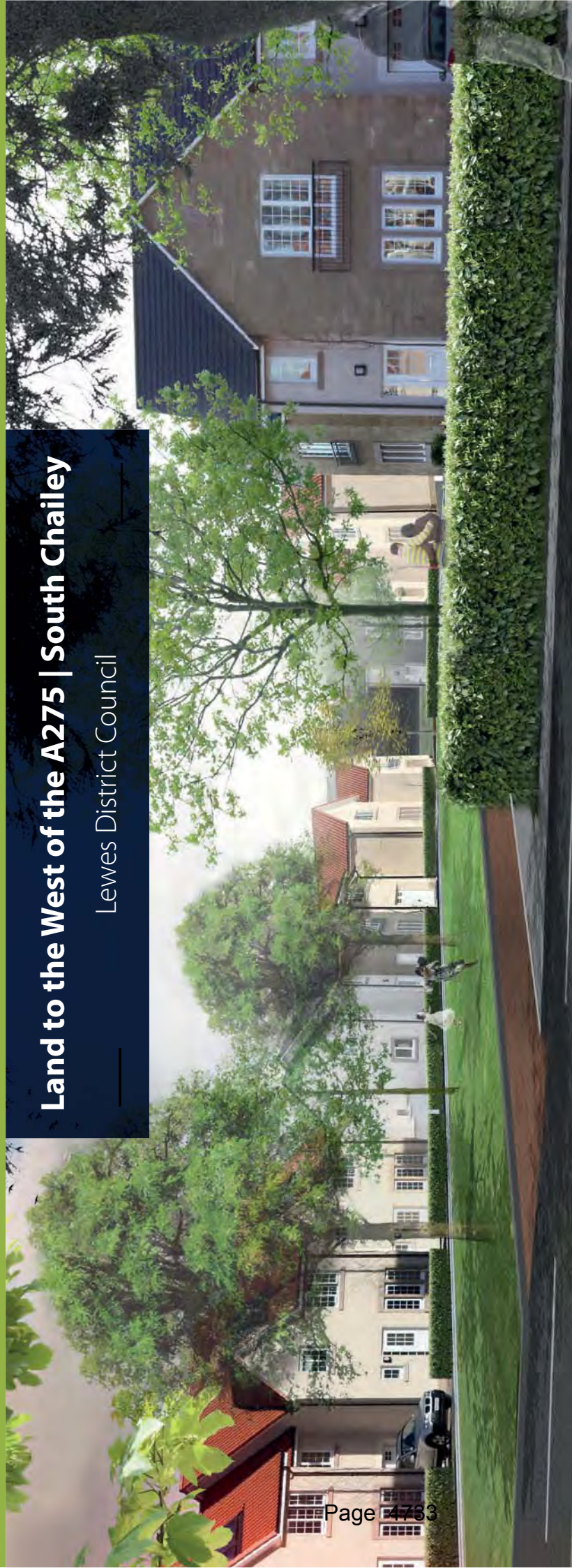
Appendix 2

Development Brief - Land to the West of the A275, South Chailey

DEVELOPMENT BRIEF

Land to the West of the A275 | South Chailey

Lewes District Council



Introduction

Gladman Developments Ltd wishes to promote land west of the A275, South Chailey for development. The 2.5 hectare site can accommodate a sustainable, distinctive residential development situated in an attractive market location to ensure the delivery of high quality homes.

A residential development on the site would incorporate both new market and affordable housing (of a variety of types, from affordable rented properties to discounted sale properties to help key workers and first time house buyers) to help meet the current and future housing needs of both South Chailey and the District.

This document includes an initial illustrative development framework plan, indicating how the site might accommodate a future residential development with high quality open space and landscaping.

The illustrative framework plan is, of course, just our first attempt at considering the development potential of the site. Gladman would welcome the opportunity to discuss the potential delivery of this site with you in more detail so it can be considered fully in the preparation of your emerging Local Plan Part 2.

Should you wish to further discuss our proposals, please contact:

Planner: Laura Tilston
Email: l.tilston@gladman.co.uk
Telephone: 01260 288925



Site & Planning Context

Site & Surroundings

The site consists of 2 open fields and is situated at the southern end of South Chailey, immediately adjacent to existing development on the A275. The site is bound by the A275 and existing development to the east, hedge and woodland to the north and west, with a public footpath along a road forming the southern boundary. The site topography is relatively flat with a small rise of around 5 meters to the northern extent.

A Vibrant Community

South Chailey hosts a population in the region of 1,000 people providing access to community facilities including:

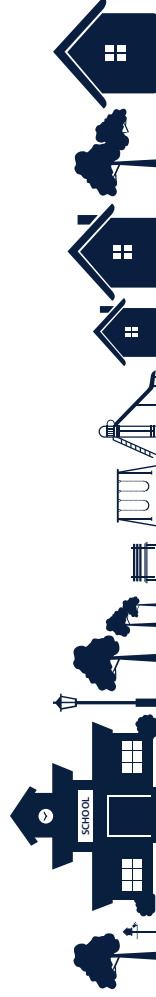
- Chailey School
- GP
- Church
- Bus links
- Shop and Post Office

South Chailey is well placed to host additional development to meet future housing need and support future economic growth.

Principle of Development

The Full Objectively Assessed Housing Need for Lewes District cannot be met due to constraints across the area such as the South Downs National Park. Therefore, further opportunities to deliver appropriate and sustainable sites for housing development will be very important for local people to meet existing housing need.

South Chailey is a settlement that can support development and is free of the national park constraint and it can therefore accommodate additional much needed homes in the District.



Site Development Potential

This site offers a unique opportunity for Lewes District Council to plan, and more importantly deliver, a new development where people will genuinely want to live and choose to stay, whilst embracing the distinctive character of the surrounding area. This will be achieved by:



Housing Delivery



The site is capable of delivering approximately 55 dwellings of varying sizes, types and tenures (including affordable housing delivered in accordance with planning policy). Gladman considers that housing on this site is capable of being brought forward within the next 5 years.

Landscape Character



The site is not designated for its environmental value, and its development can be sensitively designed to sit within the wider landscape without causing harm to local, nationally and internationally important designated assets.

Site Development Potential

Biodiversity, Green Infrastructure & Local Wildlife



The proposed development will aim to enhance the environment through the provision of green infrastructure, comprising new publically accessible greenspace and recreational paths increasing permeability to surrounding areas of interest and facilities.

Ecology surveys will be undertaken prior to the determination of the planning application. The development proposals will provide adequate mitigation as required to ensure species and habitats are protected, with enhancement where possible.

Market Appeal



The site is located near to the Swan Public House a grade II listed buildings, but the significance of the building is derived from its function as a community buildings in a village locations. The setting of the heritage asset is such that the development of the site for additional residential development in the village will have a neutral effect. The site is well screened from other heritage assets within the village and will be carefully designed to integrate with existing development.

Heritage



The site is located near to the Swan Public House a grade II listed buildings, but the significance of the building is derived from its function as a community buildings in a village locations. The setting of the heritage asset is such that the development of the site for additional residential development in the village will have a neutral effect. The site is well screened from other heritage assets within the village and will be carefully designed to integrate with existing development.

Hydrology



The development proposal falls entirely within the Environment Agency Flood Risk Zone 1 i.e. land assessed as having a less than 1 in 1,000 annual probability of flooding. The site is also not within a surface water flood risk area.

Site Development Potential

Design



A design-led approach, informed by consultation with the District Council, key stakeholders and the local community, would inform plans for the site so that a future development responds sensitively to the site's village and landscape setting. The development would make a positive addition to South Chailey, complementing the character of the surrounding area in terms of scale, density, character and quality.

Topography



The site is flat with no technical barriers to overcome in order to secure its development.

Accessibility



Development in this location will provide the quality pedestrian and cycle links into the settlement, as well as, public transport connections with adjacent developments and communities.



Site Plan With Indicative Framework Plan





Gladman Land
Gladman House, Alexandria Way,
Congleton, CW12 1LB

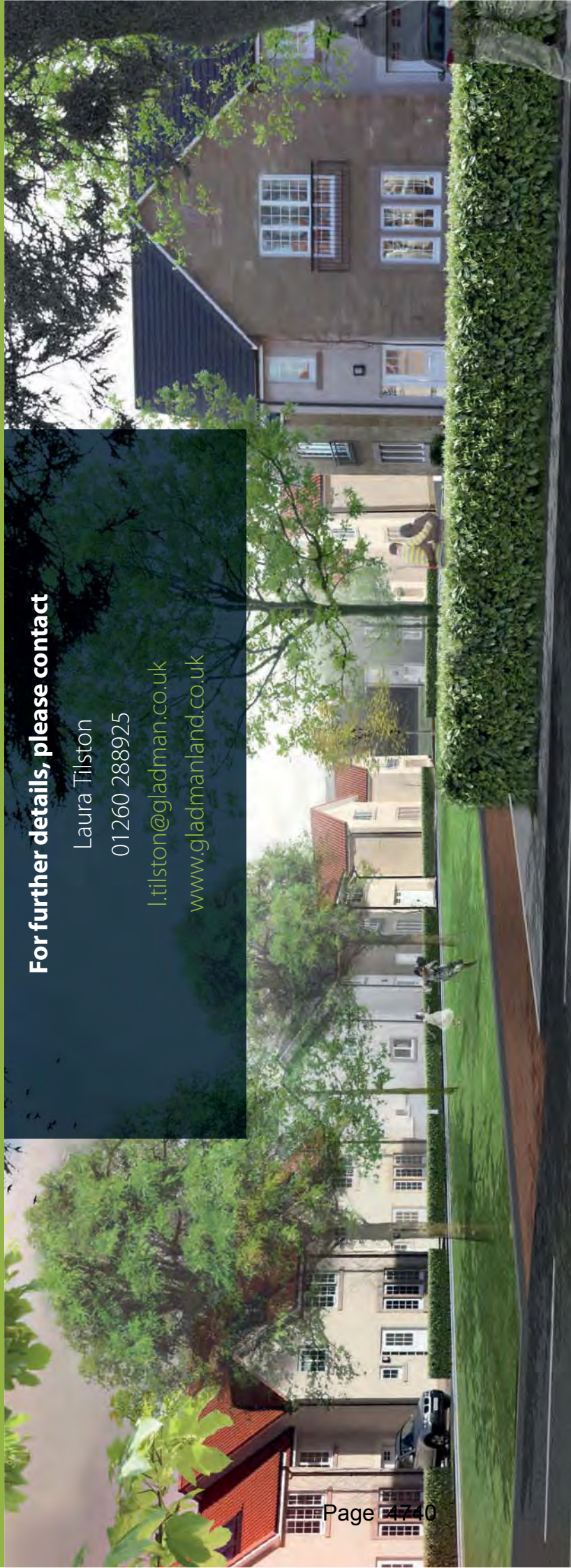
For further details, please contact

Laura Tilston

01260 288925

l.tilston@gladman.co.uk

www.gladmanland.co.uk



Representation ID: REP/117/SA

Representor Details:

Representor ID:	REP/117
Name:	Emma Creighton
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Sustainability Appraisal
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Justified
Representation:	
Leave tide mills alone.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/325/SARepresentor Details:

Representor ID:	REP/325
Name:	Anna Owczarski
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Sustainability Appraisal
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: 'As a new resident to Plumpton Green the main reason I was attracted to this lovely village was to enjoy a quiet lifestyle with beautiful surroundings. The residents of the village are very pleasant and we have so far enjoyed our time here for a mere two months. After the considerations taken into place for the Gypsy Traveller site for Plumpton Green there are some points which I hope will be considered as representation of not the community wishing to move in but the surrounding area. Since	

moving from Haywards Heath, our council tax has been considerably raised. With this in mind we have noticed certain parts of Plumpton Village which should be considered for extensive improvements. This is question is Station Road; a very busy road and the main access road throughout the village for all residents. The amount of pot holes and unevenness in the road can be seen through the whole road. With the additional 20-30 residents moving into the traveller site (understandably some will be children who do not drive cars), what improvements does the council wish to take to ensure the following:

'a) a safe road which can be accessed not only by normal size vehicles but anything from caravans, trucks or any other means of transportation.

'b) there is no path currently at certain points of Station road, predominantly the area which is being assessed for building. How will the council sustain the natural surroundings and habitants of nature as well as ensuring a safe area for walking.

'c) from my short experience here I can be honest that most vehicles that drive through the village are not 30mph but much faster, thus causing another problem especially in the heart of the village where there is a school and local shop.

'On a separate note from the meeting which took place on the 9th October in Plumpton Village hall I had some other concerns:

'1. As the sites will be regularly assessed (every 2 weeks), what are the processes in place to ensure the traveller residents are not breaking any agreements made in their contract with the council. Obviously the council is placing a lot of resources to ensure they are not in event of default with their contract. Surely if they break their contract I suppose we are back to square one as they will continue to travel as in their traditions and beliefs. Thus meaning the site in Plumpton Green would never be a PERMANENT home but merely a stop over for 6 months at a time. This would be unsettling as there would be an influx of new families always in the sites, some which might be pleasant and peaceful to others who would cause disruption and breaks their agreement or the law.

'2. There was mention in businesses which the residents of this community are able to do. Is there a better definition of what these business are and what would be considered a breach of contract. I can only assume they have some form of livelihood however are they legitimate businesses that could benefit the village?

'3. When I moved to Plumpton Green, early August 2018, I moved here to be in a picturesque village and although slightly a selfish request but are there any pictures or demonstration of what this site would look like when entering the village from The Plough pub direction. Although I am not local to the area, I am concerned that the home and area I wish to settle in and live will be damaged by the view of static caravans, which is something I really would not want to see and never invisioned for my future forever home. I appreciate that there is a government obligation to provide x amount of static homes to the traveller community but this should be done in already allocated sites.

'4. Although the choice is our own how will the new residents integrate to a new

community, especially if they move around a lot and are not in their PERMANENT base. If they are travelling also, where do they travel too and would they be paying the same council tax I pay even though they are not here for the duration of time. Also, considering some might be under special council tax schemes although saying they would pay council tax, is that honestly a true statement.

I have no further questions or points to raise but I hope my email has raised some points which you may have already be aware of and if not I hope they can be put forward for serious consideration.

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Kemp, Emma

From: Anna Owczarski [REDACTED]
Sent: 10 October 2018 21:58
To: ldf
Subject: Plumpton Green Traveller site pitch near the old brickworks

Categories: LPP2 comment to code - stakeholder details have been added

To whom this may concern,

As a new resident to Plumpton Green the main reason I was attracted to this lovely village was to enjoy a quiet lifestyle with beautiful surroundings. The residents of the village are very pleasant and we have so far enjoyed our time here for a mere two months. After the considerations taken into place for the Gypsy Traveller site for Plumpton Green there are some points which I hope will be considered as representation of not the community wishing to move in but the surrounding area. Since moving from Haywards Heath, our council tax has been considerably raised. With this in mind we have noticed certain parts of Plumpton Village which should be considered for extensive improvements. This is question is Station Road; a very busy road and the main access road throughout the village for all residents. The amount of pot holes and unevenness in the road can be seen through the whole road. With the additional 20-30 residents moving into the traveller site (understandably some will be children who do not drive cars), what improvements does the council wish to take to ensure the following:

- a) a safe road which can be accessed not only by normal size vehicles but anything from caravans, trucks or any other means of transportation.
- b) there is no path currently at certain points of Station road, predominantly the area which is being assessed for building. How will the council sustain the natural surroundings and habitants of nature as well as ensuring a safe area for walking.
- c) from my short experience here I can be honest that most vehicles that drive through the village are not 30mph but much faster, thus causing another problem especially in the heart of the village where there is a school and local shop.

On a separate note from the meeting which took place on the 9th October in Plumpton Village hall I had some other concerns:

1. As the sites will be regularly assessed (every 2 weeks), what are the processes in place to ensure the traveller residents are not breaking any agreements made in their contract with the council. Obviously the council is placing a lot of resources to ensure they are not in event of default with their contract. Surely if they break their contract I suppose we are back to square one as they will continue to travel as in their traditions and beliefs. Thus meaning the site in Plumpton Green would never be a PERMANENT home but merely a stop over for 6 months at a time. This would be unsettling as there would be an influx of new families always in the sites, some which might be pleasant and peaceful to others who would cause disruption and breaks their agreement or the law.

2. There was mention in businesses which the residents of this community are able to do. Is there a better definition of what these business are and what would be considered a breach of contract. I can only assume they have some form of livelihood however are they legitimate businesses that could benefit the village?

3. When I moved to Plumpton Green, early August 2018, I moved here to be in a picturesque village and although slightly a selfish request but are there any pictures or demonstration of what this site would look like when entering the village from The Plough pub direction. Although I am not local to the area, I am concerned that the home and area I wish to settle in and live will be damaged by the view of static caravans, which is something I really would not want to see and never invisioned for my future forever home. I appreciate that there is a government obligation to provide x amount of static homes to the traveller community but this should be done in already allocated sites.

4. Although the choice is our own how will the new residents integrate to a new community, especially if they move around a lot and are not in their PERMANENT base. If they are travelling also, where do they travel too and would they be paying the same council tax I pay even though they are not here for the duration of time. Also, considering some might be under special council tax schemes although saying they would pay council tax, is that honestly a true statement.

i have no further questions or points to raise but I hope my email has raised some points which you may have already be aware of and if not I hope they can be put forward for serious consideration.

Best regards,

Anna

Sent from my iPhone

Representation ID: REP/454/SARepresentor Details:

Representor ID:	REP/454
Name:	Robin Walker
Organisation:	Theobalds Road Residents' Association
Consultation Body:	General
Stakeholder Type:	Residents Association

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Sustainability Appraisal
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Positively Prepared Not Consistent with national policy
Representation: 1.18 This references and incorporates the various parallel documents identified as 'Sustainability Appraisal' and states that LPP2 will adopt these sustainability objectives in order to ensure consistency. Policies, statements and objectives that are inconsistent are therefore open to legal challenge. As there is no single 'Sustainability Appraisal' on	

the referenced location, but a set of sustainability documents related to 'sustainability' is available. These include, inter alia: Sustainable Economic Growth; Healthy, sustainable communities; Protecting and enhancing the distinctive quality of the environment; and Sustainable travel.

'These will be commented on in the relevant sections. However, it is clear that the plan has NOT been prepared with sustainability in mind.

What changes do you suggest to make the document legally compliant or sound?

It should recognize that the plan is not sustainable and in conflict with national policy, and either rejected or changes to comply

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

LDC had not done its job properly and should be challenged on its findings.

Habitats Regulation Assessment

Representation References: HRA

Representation ID: REP/012/HRARepresentor Details:

Representor ID:	REP/012
Name:	Lucy Howard
Organisation:	South Downs National Park Authority
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Lucy.Howard@southdowns.gov.uk
Address:	

Representation:

Policy/Section:	Habitats Regulation Assessment
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: Lewes Local Plan Part 2 and Neighbourhood Plans Habitats Regulations Assessment (HRA) The SDNPA overall supports the methodology and conclusions of the HRA in particular the use of the Joint Habitat Regulations Assessment Addendum which forms Appendix B of the Lewes Local Plan Part 2 HRA.	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?

05 November 2018

Tondra Thom
Lewes District Council
Southover House
Southover Road
Lewes
BN7 1AB

Dear Tondra

Subject: SDNPA representation to Lewes Local Plan Part 2: Site Allocations and Development Management Pre-Submission Document consultation (Regulation 19)

Thank you for consulting the South Downs National Park Authority (SDNPA) on the Pre-Submission version of the Lewes Local Plan Part 2 (LLPP2).

The SDNPA and all relevant authorities are required to have regard to the purposes of the South Downs National Park (SDNP) as set out in Section 62 of the Environment Act 1995. The purposes are 'to conserve and enhance the natural beauty, wildlife and cultural heritage of the area' and 'to promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public.'

Duty to Cooperate

The SDNPA has a set of six strategic cross-boundary priorities. I would like to take the opportunity to again highlight these which provide a framework for ongoing Duty to Cooperate discussions:

- Conserving and enhancing the natural beauty of the area.
- Conserving and enhancing the region's biodiversity (including green infrastructure issues).
- The delivery of new homes, including affordable homes and pitches for Gypsies, Travellers and Travelling Showpeople.
- The promotion of sustainable tourism.
- Development of the local economy.
- Improving the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel.

Housing

The housing provision figures set out in the emerging LLPP2 and the South Downs Local Plan (SDLP) both flow from and need to be consistent with the Lewes Joint Core Strategy notwithstanding the quashing of Policies SP1 and SP2 of the JCS insofar as they relate to the SDLP. This set a figure of 6,900 net additional dwellings to be provided in the plan area, which is equivalent to approximately 345 net additional dwellings per annum. Table I of the

Statement of Common Ground between LDC and the SDNPA signed in March 2018, which I am attaching for your reference, sets out a SDLP housing provision figure of 1,307 for the plan period 2014-2033. Table 1 of the LLPP2 gives a housing figure of 1,432 for that part of Lewes District within the SDNP for the plan period 2010-2030. The difference of 125 is most likely due to the different plan periods. It would be good to meet and discuss the matter and consider whether a focused review of the Statement of Common Ground is needed.

Site Allocations

Policy GT01 – Land south of The Plough

Welcome the proposal to allocate this site for five net additional permanent Gypsy and Traveller pitches, and the potential for meeting the assessed need for the Lewes District outside the SDNP.

Policy EI: Land at East Quay, Newhaven Port

The planned expansion of Newhaven Port is already committed to with permission granted for the building of a new road link and bridge that will come into the area allocated as site EI and connecting to the scheme with planning consent for the redeveloped East Quay area to the south west of the allocation. Under the conditions of the planning permission for the redeveloped East Quay area is the agreed provision for an area of nature reserve immediately to the east of site EI and adjacent to the SDNP boundary in the area of Tide Mills. Part of the Tide Mills area is within the SDNP to the east.

Emerging SDLP Local Plan Policy SD18: The Open Coast describes the area of Tide Mills, up to the SDNP boundary adjacent to the proposed nature reserve, as the Zone of Undeveloped Coast as shown on Figure 5.6 relating to that policy. At the coast this zone extends from west of Seaford to the SDNP boundary and the edge of the agreed nature reserve. Paragraph 5.162 of the supporting text for emerging Policy SD18 asserts the landscape sensitivity of this coastal area and the need for a coordinated approach to development which recognizes the adjacent pressures on this vulnerable area.

Core Policy 10 (CP10) of the Joint Core Strategy (JCS), Lewes Local Plan Part 1 refers to the first purpose of the SDNP, to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. CP10 also refers to appropriate mitigation and compensation where development impacts on the SDNP. The SDNP is in close proximity to site EI and through the open nature of the coastline and the adjacent agreed nature reserve is visually connected to the allocated site. Therefore it is suggested Policy EI cross-references policy CP10 and refers positively to the setting of the SDNP, and the need to respect the landscape character of this connected area with appropriate mitigation and compensation as required.

Also it is suggested the preamble paragraphs to the policy also make reference to the South Downs Integrated Landscape Character Assessment (SDILCA), specifically the Landscape Management and Development Considerations described in Appendix F, Landscape Type F: Major River Floodplains, and F2: Ouse Floodplain area <http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-F-Major-River-Floodplains.pdf> The wording should include the need for Visual and Landscape Character Assessment to be carried out on detailed proposals for site EI using the SDILCA, due to the proximity of the SDNP and the setting it provides to the proposed allocated site.

It is suggested Policy E1 cross references Policy DM24: Protection of Biodiversity and Geodiversity, given the Local Nature Reserve and Local Wildlife Sites that are likely to be effected by development on site E1, especially the proximity to the east of the agreed nature reserve.

In addition it is suggested the policy contains wording on the protection of existing connectivity on non-motorised travel routes through site E1, including to the nearby area to the east in the SDNP. This reflects the intention in the JCS Core Policy Policy 13: Sustainable Travel, bullet point c, and the policy intention for the adjacent area of the National Park as covered by Strategic Policy SD20: Walking, Cycling and Equestrian Routes in the Submission SDLP.

Policy E2: Land Adjacent to American Express Community Stadium, Village Way, Falmer

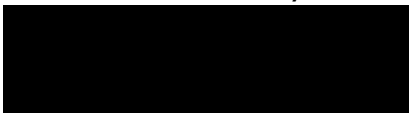
The SDNPA supports the wording in paragraph 3.19 in the preamble to the policy regarding key views into the SDNP, the stadium and the setting of the SDNP, and in paragraph 3.20 that the stadium has been designed to sit within the natural curves of the downland. We strongly support the wording in paragraphs a) and b) of Policy E2.

To be consistent with the SDNPA's response to the Brighton and Hove Draft City Plan Part 2 Consultation (Regulation 18), Policy SSA7 (site adjacent to E2) the following comments are made. We suggest adding to the preamble paragraphs that the site is also a gateway into the SDNP from the City of Brighton and Hove. We suggest adding to the policy the need to provide visual connectivity to the SDNP, and therefore consideration of the setting in proximity to the SDNP, in terms of the design of any proposed development. In the preamble paragraphs suggest adding wording referencing the proposal site as a gateway to the SDNP when exiting the City along a key transport route. Also suggest adding the need to use materials and design reflecting the setting of the SDNP and referencing the SDILCA, specifically the Landscape Management and Development Considerations described in Appendix A, Landscape Type A: Open Downland and A2: Adur to Ouse Open Downs area <http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-A-Open-Downland.pdf>

Lewes Local Plan Part 2 and Neighbourhood Plans Habitats Regulations Assessment (HRA)

The SDNPA overall supports the methodology and conclusions of the HRA in particular the use of the Joint Habitat Regulations Assessment Addendum which forms Appendix B of the Lewes Local Plan Part 2 HRA.

Yours sincerely


Lucy Howard
Planning Policy Manager
Lucy.howard@southdowns.gov.uk
01730 819284

DUTY TO COOPERATE STATEMENT OF COMMON GROUND

BETWEEN: Lewes District Council and the South Downs National Park Authority

DATE: 14 March

1. Introduction

- 1.1 This Statement of Common Ground (SCG) is a jointly agreed statement between Lewes District Council (LDC) and the South Downs National Park Authority (SDNPA). It sets out the position and understanding with respect to key relevant duty to cooperate matters, and agreed actions to resolve outstanding matters. It is not binding on any party, but sets out a clear and positive direction to inform ongoing strategy and plan-making.

2. Context

- 2.1 Section 62 of the Environment Act 1995 requires all relevant authorities, including local authorities such as LDC, to have regard to the purposes of national parks. These are:
- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area;
 - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- 2.2 As a National Park Authority and Local Planning Authority, plan-making for the SDNPA is subject to the National Planning Policy Framework (NPPF) whereby Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless specific policies in the NPPF indicate development should be restricted. An example of such restrictions given in footnote 9 on page 4 of NPPF is policies relating to the development of sites within a National Park. Paragraph 115 of the NPPF states that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.
- 2.3 Approximately 56% of the district of Lewes, and the whole of the town of Lewes, falls within the South Downs National Park. All statutory planning responsibilities within the National Park area of the district falls to the National Park Authority.
- 2.4 Part of both the South Downs National Park and Lewes District falls within the Sussex Coast Housing Market Area (HMA). Both the authorities work in partnership together to ensure that strategic planning issues are properly and holistically addressed.

3. Purpose and objectives

- 3.1 The SDNPA is preparing its first Local Plan – the South Downs Local Plan (SDLP). The SDLP is a landscape-led plan, with ecosystem services (the goods and services we get from

the natural environment) at its heart. The SDLP will provide a comprehensive development plan document to cover the whole of the National Park, and will include a policy to address all types of development, with the exception of minerals and waste.

- 3.2 The purpose of this SCG is to demonstrate clearly and concisely how strategic cross-boundary matters relevant to the SDLP, which are specific to both authorities, have been and will continue to be jointly addressed. These focus on the issue of addressing objectively assessed development needs, particularly housing needs, and on how points of disagreement between the parties are being positively resolved. Further detail is given in the South Downs National Park Duty to Cooperate Statement¹, and in the jointly prepared documents referred to below.

4. Addressing unmet housing need

- 4.1 It is agreed between the parties that the housing supply and objectively assessed need both within and outside of the South Downs National Park, is as set out in Table 1 below:

Table 1: Housing supply and need in the Lewes part of the South Downs National Park

	A	B	C	D	E	F	G	H
HMA / District area	SDLP housing provision (total) ¹	SDLP housing provision (A divided by 19 years)	OAN inside SDNP ²	Unmet need inside SDNP ³ (C minus B)	Local Authority Local Plan provision (area outside SDNP) ⁴	Local Authority OAN per annum (whole area) ⁵	Total annual over-supply by L.A./ HMA ⁶ (B+E-F)	Total annual unmet need by L.A./ HMA ⁶ (B+E-F)
Lewes	1307	69	114	45	276	520	-	175
Sussex Coast HMA ⁷	2971	156	274	112	2748	4481	-	1577

¹ SDLP & NDP housing allocations plus commitments plus windfall (to be provided over the Local Plan period 2014-33)

² South Downs HEDNA 2017 (Table 4)

³ The difference between SDNP OAN and SDNP annualised provision (previous two columns)

⁴ Lewes figure derived from total Lewes District Local Plan Part I Joint Core Strategy 2010-2030 annualised target (345) less annualised housing provision being delivered by SDLP (69).

⁵ The Lewes OAN reflects the Lewes Local Plan Part I Inspectors Report (para 22) and Inspectors Preliminary Findings (letter dated 10 February 2015) and is the upper end of the range identified in the Coastal West Sussex Duty to Cooperate Housing Study.

⁶ This is the difference between the total provision and the total OAN, for the whole area (both within and outside SDNP).

⁷ Sussex Coast HMA consists of the following lower tier/unitary authorities: Adur, Arun, Brighton & Hove, Chichester, Lewes, Worthing.

- 4.2 The housing figures in the South Downs Local Plan relating to that part of Lewes District within the National Park carry forward the scale of housing agreed in the Lewes Joint Core Strategy (JCS). The Inspector's report² on the JCS states that:

¹ South Downs National Park Duty to Cooperate Statement, 2017

² Report to Lewes District Council and the South Downs National Park Authority, by Nigel Payne BSc (Hons), Dip TP, MRTPI, MCMI, 22nd March 2016


Local Plan allocates five pitches in that part of Lewes District within the National Park. The Lewes District Local Plan Part 2 Site Allocations and Development Management Policies Draft Document published for Regulation 18 consultation in November 2017 does not allocate any Gypsy and Traveller sites due to a lack of availability of any suitable sites. Therefore there remains an unmet need for eight Gypsy and Traveller pitches across the District, five in Lewes District outside the National Park and three within the National Park. Whilst there is currently limited scope for meeting this need through allocation of sites, both parties consider that Lewes JCS Core Policy 3 and South Downs Local Plan Strategic Policy SD33 respectively set positive frameworks for bringing as-yet unidentified sites forward through the development management process.

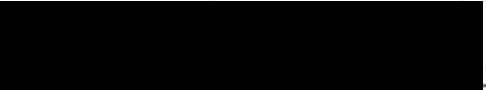
5.2 LDC is currently investigating further how to meet the unmet need across the whole district.

6. Habitat Regulations Assessment - air quality impact assessment

6.1 It is agreed between the parties that there is a strategic cross boundary issue of how to assess air quality impacts on the Ashdown Forest Special Area of Conservation (SAC) and Lewes Downs SAC, predominantly arising from traffic associated with new development. The assessment methods are being considered through the Ashdown Forest Statement of Common Ground to which both authorities are signatories.

6.2 The LDC and SDNPA joint 2015 Habitat Regulations Assessment (HRA) Addendum on air quality impacts on the Lewes Downs SAC and the joint 2017 HRA Addendum on air quality impacts on the Ashdown Forest SAC both include robustly carried out, industry standard methodology. The assessments are in combination with other plans and programmes and both conclude no likely significant effect and/or no adverse effects on integrity on the SACs, a conclusion endorsed by Natural England.

Signed on behalf of Lewes District Council

Date: 21 March 2018
Position: Head of Planning

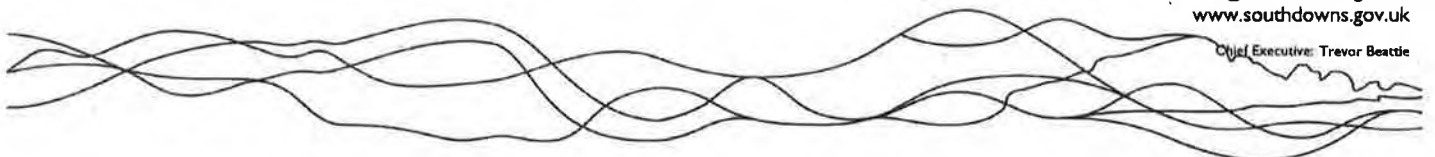
Signed on behalf of the South Downs National Park Authority

Date 24 April 2018.
Position Director

South Downs Centre, North Street,
Midhurst, West Sussex, GU29 9DH

T: 01730 814810

E: info@southdowns.gov.uk
www.southdowns.gov.uk

Chief Executive: Trevor Beattie



It is effectively common ground between the Councils, the HBF, the CPRE and others, including numerous Parish Councils and major house builders active in the locality, that the agreed OAN figures cannot be met in full in this district at present. This is so, even at the lowest end of the range identified, without unacceptable environmental consequences that would be contrary to the policies and guidance in the NPPF and PPG. This takes into account the constraints of the NP, the flood risks locally and other significant factors, including the capacity of the road network, notably on the A27 and A259, and coastal erosion, amongst other things, such as the two Special Areas of Conservation (SAC) and the Heritage Coast designation. As noted in respect of the DtC, there is no realistic prospect of any material help in achieving new housing delivery from nearby Councils in the near future, pending further work on a sub-regional basis and a potential plan review (paragraph 25)

4.3 The SDNPA and LDC agree that the objectively assessed housing needs in the district still cannot be met without unacceptable environmental consequences and that there continues to be an unmet housing need whereby paragraphs 179-181 of the National Planning Policy Framework is engaged. The parties to this agreement are addressing this as far as is consistent with the policies set out in the Framework, in the following ways:

- i) The study 'Defining the HMA and FEMA' (GL Hearn, 2017) prepared on behalf of the Greater Brighton and West Sussex Strategic Planning Board identifies that Lewes District falls primarily within the Brighton & East Sussex Housing Market Area (HMA). It is acknowledged that the South Downs National Park HEDNA nevertheless uses the previous, larger Coastal Sussex HMA which includes Lewes district.
- ii) A Coastal West Sussex and Greater Brighton Local Strategic Statement (LSS) was published in October 2013 and updated in January 2016.³ The Statement sets out a number of strategic priorities designed to maximize development potential, balanced against managing the many environmental assets and natural resources in the area. A Memorandum of Understanding has also been signed by all parties, which confirms an ongoing commitment to joint working across administrative boundaries.⁴

4.4 It is agreed by both parties that the continued joint work of the Coastal West Sussex and Greater Brighton Strategic Planning Board is the most appropriate mechanism for addressing unmet development needs in the Housing Market Area. The Board has now started work to address the challenge for the future of creating an approach which allows all the authorities in the Board to work collectively on developing a new high level plan known as LSS3. This will seek to address the 'larger than local' issues that are currently holding back the potential of the sub region, and each individual authority will be able to prepare their own plans from 2030 onwards to not only address their own local issues, but also set out how they intend to address the cross boundary issues set out in the LSS3. Further details are set out in the South Downs National Park Duty to Cooperate Statement.

5. Gypsies and Travellers

5.1 The East Sussex Joint Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) published in 2015⁵ covers all of Lewes District inside and outside the National Park. It identified a need for 13 net additional permanent pitches for the period 2016 to 2028. Core Policy 3 of the JCS sets a requirement for 13 net additional permanent pitches for Gypsies & Travellers across Lewes District. The South Downs

³ <https://coastalwestsussex.org.uk/wp-content/uploads/2016/05/FINAL-LSS-Refresh-Final-version-Jan-16-180416.pdf>

⁴ <https://coastalwestsussex.org.uk/wp-content/uploads/2014/02/FINAL-CWS-SPB-MoU-Feb-2014-Final-Signed.pdf>

⁵ East Sussex Joint Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment, January 2015, University of Salford

Representation ID: REP/020/HRARepresentor Details:

Representor ID:	REP/020
Name:	Lois Partridge
Organisation:	Mid Sussex District Council
Consultation Body:	Specific
Stakeholder Type:	Other Local Authority

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	lois.partridge@midsussex.gov.uk
Address:	Oaklands Road Haywards Heath E Sussex RH16 1ss

Representation:

Policy/Section:	Habitats Regulation Assessment
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: Lewes District Local Plan Part 2: Site Allocations and Development Management Policies Pre-Submission Document September 2018 Mid Sussex District Council (MSDC) welcomes the opportunity to comment on the Lewes District Plan Part 2 Pre-Submission document ('the Plan'). The Council has a number of comments it wishes to make. Habitats Regulations Assessment (HRA)	

The District Council remains committed to co-operating with the other affected local authorities through the Ashdown Forest Officer Working Group and looks forward to working in partnership to protect the Ashdown Forest SAC in an appropriate manner.

If you would like to discuss any of these comments, please contact Alice Henstock, Senior Planning Policy Officer, alice.henstock@midsussex.gov.uk

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Contact:

Councillor Andrew MacNaughton Tel: 01293 522817
email: andrew.macnaughton@midsussex.gov.uk

Your Ref:

Our Ref: AMN/LP

Date:

5th November 2018

BY EMAIL

Dear Sir/Madam,

**Lewes District Local Plan Part 2: Site Allocations and Development Management Policies
Pre-Submission Document September 2018**

Mid Sussex District Council (MSDC) welcomes the opportunity to comment on the Lewes District Plan Part 2 Pre-Submission document ('the Plan'). The Council has a number of comments it wishes to make.

Planned Housing Growth

Spatial Policy 2 of the Joint Core Strategy Lewes District Local Plan Part 1 identified that provision would be made for 6,900 new homes in Lewes District between 2010 and 2030. Provision was made for 1,073 units through strategic allocations, with 2,216 units built or committed as at 1 April 2015, and supply from windfall and rural exceptions sites allowance of 545 units.

MSDC notes that the residual housing requirement to be provided in the Plan is 1,660 units. However, the Plan only allocates sites to meet 432 units of that residual need, with the other 1,250 units to be delivered from made and emerging Neighbourhood Plans. MSDC has concerns with this approach.

Of the 1,250 homes identified in the Plan which are anticipated to be delivered from Neighbourhood Plans, a total of 865 units are identified in the Newhaven, Peacehaven and Telscombe and Seaford Neighbourhood Plans. These plans are still emerging, and are at a relatively early stage of their preparation.

Peacehaven and Telscombe have only this year carried out a Call for Sites, Seaford has not yet consulted on its Regulation 14 draft Plan, and Newhaven Town Council has not yet consulted on its Regulation 16 draft Plan. As such, the allocation of sites through these plans has not been tested through the Examination process, nor approved through a referendum.

It is acknowledged that Lewes District Council (LDC) commits to closely monitor the progress of the Neighbourhood Plans, and has set out a mechanism to review the Council's approach to Neighbourhood Planning, if any concerns arise regarding timings.

Paragraph 2.16 of the Plan notes that LDC will consider what, if any, measures are needed to resolve the issue. These might include LDC recovering the role of identifying allocations through a subsequent development plan document or a future review of the Local Plan.

Working together for a better Mid Sussex



This would have been a pragmatic approach, if all the Neighbourhood Plans were already 'made'. However, as several of the Neighbourhood Plans on which the Plan relies to deliver housing are not yet close to this stage, there is a significant risk that they may not deliver the required housing, and a further risk that if the housing does come forward, it will not be delivered by 2030, the end of the Plan period.

MSDC notes the requirements of the NPPF, paragraph 23 of which states that:

'Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.'

MSDC questions whether the reliance on emerging Neighbourhood Plans represents a clear strategy for bringing sufficient land forward, to deliver the strategic priorities of the area.

Lewes District Council is therefore encouraged to identify further sites to allocate for housing through the Plan preparation process, to remove the uncertainty of delivery associated with as yet untested, draft Neighbourhood Plans. This approach will seek to ensure that there is minimum unmet need within Lewes District, and that neighbouring authorities are not asked to review whether they are able to meet this unmet need.

Policy BHO1 (Land at The Nuggets, Valebridge Road)

Policy BH01 allocates land at The Nuggets for 14 homes, which is proposed to be accessed through the property 'Woodreeves'. The site lies immediately adjacent to the border with Mid Sussex District, with the proposed access to the site from land in Mid Sussex District.

In response to Lewes District Council's previous, Regulation 18 consultation on the draft Site Allocations and Development Management Policies document, MSDC noted that the policy should acknowledge the impact of the proposed development on services and facilities provided in Mid Sussex District, due to the proximity of the development to the district boundary. This is particularly relevant now, as there is a current planning application for 25 homes on this site, rather than the 14 units set out in the draft allocation.

It is disappointing to note that, while paragraph 2.47 of the supporting text to Policy BH01 notes that the proposed access for the site lies within the county of West Sussex, the text and the policy still do not acknowledge that the shops, services and public transport provision which will support the new residents of the development lie within Mid Sussex District.

As set out in our previous response, in line with the spatial strategy set out in our District Plan Burgess Hill is subject to a major growth programme for 5,000 new homes, and 25 hectares of employment land along with associated infrastructure. MSDC is working closely with service and infrastructure providers to ensure that the corresponding social, community and highways infrastructure is provided in a timely manner to support this strategic development.

MSDC will be responding to future Lewes District Council 'Community Infrastructure Levy Window for Bidding' to ensure that development on the border with Mid Sussex makes a proportional contribution to the impact that the development will have on local services and facilities.

BH02 (Land at Oakfields, Theobalds Road)

Mid Sussex District Council welcomes the removal of the draft allocation of Land at Oakfields, Theobalds Road, Burgess Hill which was in the previous version of the Plan.

Gypsy and Traveller Provision

MSDC welcomes the inclusion of the proposed allocation of Land south of the Plough for 5 additional permanent Gypsy and Traveller pitches in Policy GT01, and notes that this allocation meets the need identified in the Gypsy and Traveller Accommodation Assessment, 2015, for Lewes District outside of the National Park, over the Plan period.

Policy DM1: Planning Boundary

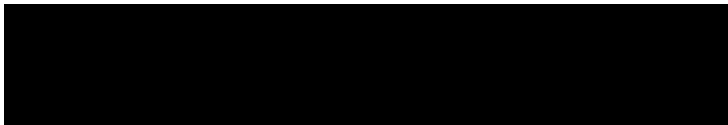
MSDC welcomes the fact that the Planning Boundary on the Plan's Policies Map, Inset Map 11 – Edge of Burgess Hill, has been amended since the previous consultation, to exclude land east of Valebridge Road, which is not allocated for development. This will help to ensure that this land is protected as open countryside, and will help to deter speculative development in this area.

Habitats Regulations Assessment (HRA)

The District Council remains committed to co-operating with the other affected local authorities through the Ashdown Forest Officer Working Group and looks forward to working in partnership to protect the Ashdown Forest SAC in an appropriate manner.

If you would like to discuss any of these comments, please contact Alice Henstock, Senior Planning Policy Officer, alice.henstock@midsussex.gov.uk

Yours sincerely,



Councillor Andrew MacNaughton
Cabinet Member for Housing and Planning

Representation ID: REP/021/HRARepresentor Details:

Representor ID:	REP/021
Name:	Rebecca Pearson
Organisation:	Natural England
Consultation Body:	Specific
Stakeholder Type:	National group or organisation

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	Rebecca.Pearson@naturalengland.org.uk
Address:	Guildbourne House Chatsworth Road Worthing West Sussex BN11 1LD

Representation:

Policy/Section:	Habitats Regulation Assessment
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	Yes
Representation: Habitats Regulations Assessment-clarification required We advise that the Habitats Regulations Section presented in the Pre-Submission document does not concur with the findings of the accompanying Habitats Regulations Assessment for the Local Plan Part 2. Although Natural England agrees with the findings of the attached HRA, following the recent People Over Wind European Judgement,	

aspects of the HRA and its interpretation within the core document need to be amended as follows:

Conclusion of NSLE for the Plan

Natural England does not agree with the conclusion that the implementation of the Lewes Local Plan Part 1 or 2 will have no Likely Significant Effect as cited in the Lewes Local Plan Part 2 Document . We advise that this conclusion needs to be revised to concur with the published HRA and the recent People Over Wind European Judgement. Following this judgement competent authorities are no longer able to include mitigation for impacts to European Sites at the screening stage of an HRA. Therefore it is not appropriate to rely on ameliorative (mitigation) measures such as SANGS and SAMS and policies pertaining to these when determining any likely significant effects within Habitats Regulations Assessments. We advise that an appropriate assessment will be required if, in the absence of mitigation, the competent authority cannot conclude "no likely significant effect". However mitigation can be used at the appropriate assessment stage.

The HRA correctly interprets this judgement and sets out that any development within 7km of Ashdown Forest SPA and SAC (within the plan area) without the mitigation set out in Core Policy 10 of the Local Plan Part 1 could have an in-combination on the international site via recreational pressure; therefore concluding a likely significant effect cannot be ruled out. The HRA therefore takes this through to appropriate assessment as no likely significant effect cannot be concluded. We agree with this approach.

Including Air Pollution impacts in the Appropriate Assessment stage Page 2 of 6

We note the following statement:

3.39 states that In summary, the only impact pathway that requires consideration in the LPP2 HRA is recreational pressure upon Ashdown Forest SPA and SAC as this is the only impact pathway for which a conclusion of no likely significant effect or no adverse effect on integrity could not be reached for the growth in the Joint Core Strategy without mitigation.

We advise that air pollution also needs to be included here as an-in combination effect remains for this impact in the absence of mitigation. We recognise that the HRA has indeed taken this through to appropriate assessment, but for clarity and to ensure no misinterpretation is made we advise that the above sentence is revised to include air pollution.

Overall conclusion for the HRA

We agree with the following statement:

It is therefore be concluded that no adverse effect upon the integrity of Ashdown Forest SAC is expected to result from development provided by the South Downs Local Plan/Lewes JCS, even in- combination with other plans and projects.

However the audit pathways taken (through appropriate assessment ,where relevant) in order to reach this conclusion should be more clearly defined in the HRA as above and

importantly, accurately interpreted within the LLPP2 Submission Document.

Further advice

1.19 We advise that the following sentence should be re-worded

A Likely Significant Effect must be established both in terms of the individual plan and of the plan in combination with other policies and proposals,

We advise that this should read:

Any likely Significant Effect must be established both in terms of the individual plan and of the plan in combination with other policies and proposals

CLARIFICATION ADDED -

You do not need to add air pollution as an impact pathway for which mitigation is needed. We are satisfied with the evidence provided for air pollution impacts and concur that no mitigation is required in order to conclude no likely significant effect."

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?



Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Sir/Madam

Planning consultation: Lewes District Local Plan Part 2 Site Allocations, Development Management Policies Pre-Submission Document and Habitats Regulations Assessment (HRA)

Thank you for your consultation on the above dated 05 December 2017 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Please find our comments in relation to the Lewes District Local Plan Part 2 Site Allocations, Development Management Policies and Habitats Regulations Assessment (HRA)

Habitats Regulations Assessment-clarification required

We advise that the Habitats Regulations Section presented in the Pre-Submission document does not concur with the findings of the accompanying Habitats Regulations Assessment for the Local Plan Part 2. Although Natural England agrees with the findings of the attached HRA, following the recent *People Over Wind* European Judgement, aspects of the HRA and its interpretation within the core document need to be amended as follows:

Conclusion of NSLE for the Plan

Natural England does not agree with the conclusion that the implementation of the Lewes Local Plan Part 1 or 2 will have *no Likely Significant Effect* as cited in the Lewes Local Plan Part 2 Document. We advise that this conclusion needs to be revised to concur with the published HRA and the recent *People Over Wind* European Judgement. Following this judgement competent authorities are no longer able to include mitigation for impacts to European Sites at the screening stage of an HRA. Therefore it is not appropriate to rely on ameliorative (mitigation) measures such as SANGS and SAMS and policies pertaining to these when determining any likely significant effects within Habitats Regulations Assessments. We advise that an appropriate assessment will be required if, in the absence of mitigation, the competent authority cannot conclude "no likely significant effect". However mitigation can be used at the appropriate assessment stage.

The HRA correctly interprets this judgement and sets out that any development within 7km of Ashdown Forest SPA and SAC (within the plan area) without the mitigation set out in Core Policy 10 of the Local Plan Part 1 could have an in-combination on the international site via recreational pressure; therefore concluding a likely significant effect cannot be ruled out. The HRA therefore takes this through to appropriate assessment as no likely significant effect cannot be concluded. We agree with this approach.

Including Air Pollution impacts in the Appropriate Assessment stage

We note the following statement:

3.39 states that *In summary, the only impact pathway that requires consideration in the LPP2 HRA is recreational pressure upon Ashdown Forest SPA and SAC as **this is the only impact pathway for which a conclusion of no likely significant effect or no adverse effect on integrity could not be reached for the growth in the Joint Core Strategy without mitigation.***

We advise that air pollution also needs to be included here as an-in combination effect remains for this impact in the absence of mitigation. We recognise that the HRA has indeed taken this through to appropriate assessment, but for clarity and to ensure no misinterpretation is made we advise that the above sentence is revised to include air pollution.

Overall conclusion for the HRA

We agree with the following statement:

It is therefore be concluded that no adverse effect upon the integrity of Ashdown Forest SAC is expected to result from development provided by the South Downs Local Plan/Lewes JCS, even in- combination with other plans and projects.

However the audit pathways taken (through appropriate assessment ,where relevant) in order to reach this conclusion should be more clearly defined in the HRA as above and importantly, accurately interpreted within the LLPP2 Submission Document.

Further advice

1.19 We advise that the following sentence should be re-worded

A Likely Significant Effect must be established both in terms of the individual plan and of the plan in combination with other policies and proposals,

We advise that this should read:

Any likely Significant Effect must be established both in terms of the individual plan and of the plan in combination with other policies and proposals

Overarching advice-net gain

Since the Publication of the Lewes Local Plan Part 2 The NPPF has been amended and contains a clear direction to ensure new development demonstrates a net gain in biodiversity. We welcome this approach. The various allocation sites will need to echo this direction stemming from a clear steer within Policy DM24 to include net gain as advised variously throughout our advice letter below:

The revised NPPF states the following:

170 d). Planning policies and decisions should contribute to and enhance the natural and local environment by“minimising impacts on and providing net gains for biodiversity....” 174 b) Plans should “....identify and pursue opportunities for securing measurable net gains for biodiversity”

118. Planning policies and decisions should: a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains-such as developments that would enable habitat creation or improve public access to the countryside”

Site Allocations

Policy NH01 - South of Valley Road

This allocation is close to the National Park boundary and we welcome the inclusion of the requirement to fully assess the impacts of views on any development here.

Policy NH02 - Land at The Marina

We note that this allocation has the potential to impact on biodiversity. We advise that the allocation policy includes a requirement for a net gain in biodiversity in order to comply with the recently revised NPPF (further discussed in Policy DM24).

Policy BH01 - Land at The Nuggets, Valebridge Road

This Site allocation is surrounded by ancient woodland and networks of natural Habitats. We welcome that this policy has been amended to include the irreplaceable nature of ancient woodland and note the additional information pertaining to this in the supporting text. Thank you for consulting Natural England on this matter.

Again the development will need to demonstrate a net gain in biodiversity and we further advise that networks of natural habitats should be maintained and enhanced in order to provide a development which is sympathetic to its location and clearly biodiversity-lead. We advise this should be a key requirement to guide any development proposals.

We also advise re-iterate that the policy should state that impacts to ancient woodland should be *avoided* to echo to the recently updated NPPF as follows:

175 c) “development *resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons (footnote 58) and a suitable compensation strategy exists*”.

Policy BA03 - Land at Bridgelands Barcombe Cross

We further advise that this policy includes the consideration of the use of SuDS. We welcome that it is included in the supporting text but it is not a requirement within the policy. We advise that well-designed SuDS have multiple benefits for wildlife and people, providing habitats and valuable ecosystems services such as, flood amelioration. A SuDS lead scheme would be welcome here.

Policy CH01 – Glendene, Station Road

We note that ancient woodland lies adjacent to the site and would refer you to our Standing advice with regard to this matter. This includes a requirement for a buffer of at least 15m between the woodland and the development. We welcome that SuDS are cited for use here and we note that full ecological surveys to include protected species have and will be carried out.

Policy CH02 – Layden Hall, East Grinstead Road

This site lies adjacent to Chailey Common Site of Special Scientific Interest (SSSI). Chailey Common Site of Special Scientific Interest (SSSI) is afforded statutory protection under the *Wildlife and Countryside Act 1981* (as amended). Thank you for consulting Natural England regarding this allocation policy which I note has been amended to include the SSSI. We have the following additional comments to make regarding the following:

An ecological impact assessment is undertaken and appropriate measures identified and implemented accordingly to mitigate potential adverse impacts on Chailey Common SSSI and the local biodiversity. Development allows for the protection of biodiversity and enhancement where possible; and

Again due to the nature and location of this site we advised that the term *where possible* was omitted as enhancement should be a requirement of new development (as for policy BH01). We had understood that this had been revised to reflect our advice. We further add that the need to demonstrate biodiversity net gain will be of key importance here. Consideration of this will also need to be made with regard to any tree felling on site.

We advise that the policy states that impacts to the SSSI must be *avoided*.

Newick

We note Policy DM Planning Boundaries that states Development proposals that result in a net increase of one or more dwellings within 7km of the Ashdown Forest will only be permitted where they comply with Core Policy 10(3) of the Local Plan Part 1. As Newick falls within this zone we

advise that it is worth noting that development will need to be commensurate with this specific DM Policy here.

Employment Site Allocations

Land at East Quay, Newhaven Port

Natural England has serious concerns regarding this allocation.

The allocation site is directly adjacent to and in the setting of, the South Downs National Park. There is therefore clear potential for a significant impacts on the Special Qualities of the South Downs National Park. The policy states that visual impacts will be minimised however, from the information supplied, the impact from the development of this land in both landscape and visual terms is likely to be significant. This allocation did not form part of previous iterations of the LLPP2 although we note that part of this land was included in the 2003 Local Plan. We are very concerned that it has been included at this late stage. We also note that the employment quota has already been fulfilled elsewhere within the Local Plan area. Due to the sensitive location of this site we therefore question the need for the inclusion of this site in the Plan. The site is located in an area of open coastline surrounded by a nature reserve.

Furthermore the allocation site contains valuable priority habitats of vegetated shingle and floodplain grazing marsh for example. The allocation boundary stretches down to the mean high water mark. This is of key concern to Natural England. The policy and supporting text make no mention of the biodiversity value of this site and this is of key concern to Natural England. We advise that this allocation site is removed from the LLPP2. We advise that you contact the South Downs National Park Authority for their advice on this matter. We will be also be happy to advise further on this matter.

We further advise that any obstruction to public rights of way and any intrusion of the England Coastal Path is avoided.

Policy E2: Land Adjacent to American Express Community Stadium, Village Way, Falmer

This allocation also lies in the setting of the South Downs National Park. We advise that they are consulted for their advice on this allocation site.

Policy DM14: Multi-functional Green Infrastructure

We welcome this policy which recognises the importance of the provision of multifunctional green infrastructure throughout new development. Multifunctional G.I provides a wealth of benefits for people and wildlife and provides a key role in the provision of ecosystems services. We fully support this policy.

We note the following wording which we advise requires clarification:

(G.I) would be provided where justified by the character of the area or the need for outdoor playing space. We advise that Green Infrastructure, if well designed, should incorporate a multitude of functions as identified in the supporting text, and that accessible natural greenspace rather than outdoor playing (amenity) space should be a governing factor for this. We advise that the important role that Green Infrastructure has in contributing to biodiversity and environmental net gain should be highlighted here.

Strategic provision of GI

We advise that GI should be strategic in Nature. Planning for GI at a strategic scale based on a robust evidence base has clear benefits for people and wildlife. A well-designed G.I strategy can provide Natural Capital and secure Ecosystems services in a resilient way that safeguards resources for people and wildlife into the future. Links to wellbeing, health and climate change provision for example are clear. Natural England would welcome the opportunity to contribute to the formation of any future GI strategy. We attach a GI checklist in support of this.

Children's Playing Space

We fully support this policy. Interaction with the natural world has multiple benefits for people and linking this to G.I networks and cycle routes for example can enhance this.

Policy DM18: Recreation and Rivers

We support this policy

Policy DM24: Protection of Biodiversity and Geodiversity

We note this policy and have the following amendments to make:

The protection pertaining to SSSIs is provided to mimic that of the NPPF but the wording provided lacks the strength of the NPPF in the following ways.

Development which would be likely to adversely affect a Site of Special Scientific Interest (SSSI), National Nature Reserve (NNR), or a Marine Conservation Zone (MCZ) will only be permitted where the benefits of the development, at this site, outweigh the damage to the nationally recognised special interest of the designated site and any adverse impacts on the wider network of SSSIs.

The NPPF states that:

*175 c). "development on land within or outside a SSSI, and which is likely to have an adverse effect on it **(either individually or in combination with other developments)**, should not normally be permitted. **The only exception** is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs"*

The phrases highlighted above provide a greater level of protection than those included in the Local Plan.

We advise that collaboration is required between the hierarchy of sites in order to reflect the NPPF as follows:

Outside of designated sites

Irreplaceable habitats

We advise that irreplaceable habitats be placed above local sites in the hierarchy of designations to reflect their national importance and complexity. Once lost these habitats are by their very nature, irreplaceable. The NPPF reflects this and has recently been revised to give greater weight to the protection of ancient woodland for example.

175 c) "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons (footnote 58) and a suitable compensation strategy exists".

Priority habitats and species

These include species and habitats listed under S41 of the NERC Act 2006. This includes priority habitats and species and should be clearly referenced separately to protected species.

Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication 'Guidance for Local Authorities on Implementing the Biodiversity Duty'.

We further advise that links to Green Infrastructure policies should be made.

We would re-iterate our advice in our letter of January 2018 that the policy includes networks of natural habitats and the consideration of biodiversity on a landscape- scale. Habitat networks are not only rich in biodiversity in their own right but also act as key stepping stones for species throughout the landscape. For example the provision interlinking habitats play an important role in enabling genetic exchange between populations within habitats throughout the landscape. They also act as flightlines and foraging areas for bats for example and provide migratory pathways through the landscape.

I would refer you to the SDNP Local Plan Policy SD12 for an example of a Biodiversity Policy which encompasses these issues and which we fully support. The SDNP Local Plan also has an overarching requirement for net gain. We advise that net gain is included in this policy as an overarching requirement. The NPPF States the following:

170 d). Planning policies and decisions should contribute to and enhance the natural and local environment by “ minimising impacts on and providing net gains for biodiversity....” 174 b) Plans should “.identify and pursue opportunities for securing measurable net gains for biodiversity”

118. Planning policies and decisions should: a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains-such as developments that would enable habitat creation or improve public access to the countryside”

Policy DM27: Landscape Design

We advise that this policy includes the requirement to protect the Special Qualities of the South Downs National Park as future developments outside the National Park may nevertheless affect it’s setting or views in or out of this nationally designated landscape.

Policy DM35: Footpath, Cycle and Bridleway Network

We advise that links to Green Infrastructure could be made in this policy.

I hope the above is helpful and please do not hesitate to contact me should you wish to discuss this matter. Please send further correspondence, marked for my attention, to consultations@naturalengland.org.uk quoting our reference 259464

Yours sincerely

Rebecca Pearson
Lead Adviser
Sustainable Development

Thea Davis

From: Thom, Tondra
Sent: 06 November 2018 15:15
To: ldf
Subject: FW: Lewes Local Plan Part 2 Pre-Submission

Please see and add to NE rep the below clarification

From: Pearson, Rebecca (NE) [mailto:Rebecca.Pearson@naturalengland.org.uk]
Sent: 06 November 2018 14:56
To: Thom, Tondra
Subject: RE: Lewes Local Plan Part 2 Pre-Submission

Hi Tondra

You are absolutely right, the confusion was that the level of detail provided was an enhanced level but this did not of course mean that mitigation was required to concluded no likely significant effect!

So, in answer to your query

You do not need to add air pollution as an impact pathway for which mitigation is needed. We are satisfied with the evidence provided for air pollution impacts and concur that no mitigation is required in order to conclude no likely significant effect.

I hope this is helpful, please do get in touch should you wish further clarification.

Warmest wishes

Rebecca

From: Thom, Tondra [mailto:Tondra.Thom@lewes-eastbourne.gov.uk]
Sent: 06 November 2018 12:14
To: Pearson, Rebecca (NE)
Cc: ldf
Subject: RE: Lewes Local Plan Part 2 Pre-Submission

Hi Rebecca,

Thank you for the Natural England rep you submitted, I appreciate that you managed to submit this within the timeframe of the consultation period, that's most helpful. I accept that the People over Wind Judgement means we need to reword the LSE section as mitigation has to be applied through AA rather than at screening stage – this applies to the 7km recreation impact zone for Ashdown Forest.

I do have one query though, on which I would like some clarification on please. On page 2 of your rep under air pollution impacts heading, you state the following:

We note the following statement:

3.39 states that *In summary, the only impact pathway that requires consideration in the LPP2 HRA is recreational pressure upon Ashdown Forest SPA and SAC as **this is the only impact pathway for which a conclusion of no likely significant effect or no adverse effect on integrity could not be reached for the growth in the Joint Core Strategy without mitigation.*** (my emphasis)

We advise that air pollution also needs to be included here as an-in combination effect remains for this impact in the absence of mitigation. We recognise that the HRA has indeed taken this through to appropriate assessment, but for clarity and to ensure no misinterpretation is made we advise that the above sentence is revised to include air pollution. (my emphasis)

Whilst I agree that our work on air pollution did result in AA being undertaken - due to the scientific rigour of assessment it could hardly be considered screening and the ecological interpretation did result in conclusions regarding the integrity of the Forest; however at no point was it concluded that mitigation is required alone or in combination. To add air pollution to the sentence in bold would imply that mitigation is required.

I am concerned that your rep implies that mitigation is required for air quality impacts, when our conclusion in the HRA does not identify this requirement.

Could you please clarify that we do not need to add air pollution as an impact pathway to the above sentence and can you confirm that you agree with the conclusion of the HRA that no mitigation is required?

Thank you

Tondra

Tondra Thom

Planning Policy Manager

Lewes District and Eastbourne Borough Councils

Tel: 01273 085677 or 01323 415677

Mobile: 07824 596 985

E: tondra.thom@lewes-eastbourne.gov.uk

W: lewes-eastbourne.gov.uk

From: Pearson, Rebecca (NE) [<mailto:Rebecca.Pearson@naturalengland.org.uk>]

Sent: 05 November 2018 17:48

To: ldf

Subject: Lewes Local Plan Part 2 Pre-Submission

Dear Sir/Madam

Please find attached Natural England's comments on the above document.

Kind regards

Rebecca Pearson

Lead Adviser

Sustainable Development Team

Natural England

Guildbourne House, Chatsworth Road

Worthing BN11 1LD

Tel: 0300 060 4090 Mobile: 07810694335

I work part-time Monday to Wednesday.

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England is accredited to the Cabinet Office Customer Service Excellence Standard

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Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

Initial advice on providing GI strategies in Local Plans

Key principles

The National Planning Policy Framework (NPPF) states in paragraph 114 that local planning authorities should:

“set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure;”

Supporting guidance to the NPPF is set out in the National Planning Practice Guidance at: <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/biodiversity-ecosystems-and-green-infrastructure/>

GI is multifunctional and provides ecosystem services; if well-designed it encompasses linking habitat networks, climate change mitigation, flood management, health and wellbeing, alternative transport links, improved air quality, food production, and habitat creation for example. GI can also be effectively used to provide biodiversity net gain.

Stages of creating a GI Strategy

Use mapping tools (see below) to evaluate:

- 1) Evidence Base-Existing GI
 - a) Typology Mapping -What GI resources are already there? (for example woodland extent)
 - b) Functionality Mapping - What is the GI currently doing?
- 2) What is required in your Plan Area?
 - c) What are the functional needs of the area? Priority themes, local plan policy, how can the GI resource be improved?
 - d) Where are these needs? Spatial mapping.
- 3) Design The GI Strategy based on evidence from 1-4 above

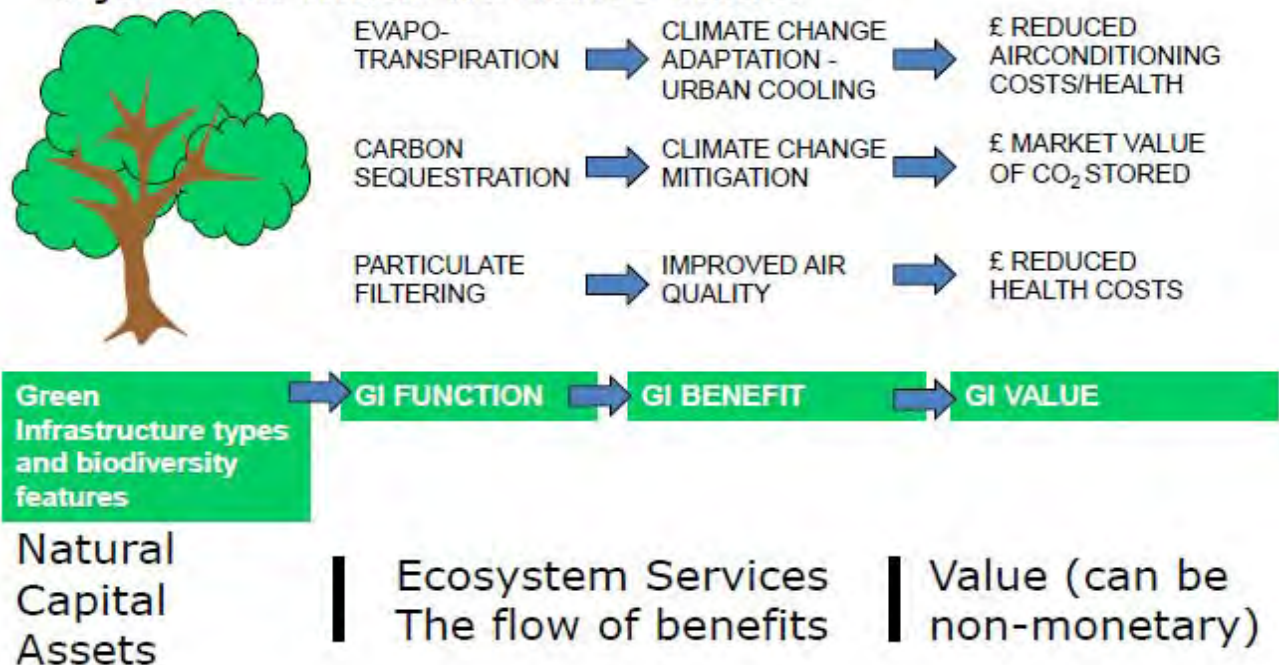
Evidence base-what tools are available to provide this?

There are a variety of tools available to provide the evidence base. The Ecosystems Knowledge Network <https://ecosystemsknowledge.net/> includes further information and range of tools available. The tool adopted will depend on local requirements.

Links between Natural Capital, GI and Ecosystems Services

GI Planning - Linking Natural Capital, Green Infrastructure and Ecosystem Services.

From biodiversity to value – the physical entity does a job from which we derive value.



Green Infrastructure, Natural capital and Ecosystems services are fundamentally linked as demonstrated above. Understanding these links is key to developing a GI Strategy.

A GI strategy can be used to:

- Inform development decisions and design .Ensure project-level interventions contribute to the strategy;
- Support the development of Green Infrastructure Policy and other policies in the Local Plan (for example biodiversity, health and wellbeing, climate change due to multifunctional nature) and support Local Plan reviews;
- Provide evidence to inform and guide other strategic actions and bids for resources (LEP/LNP for example);
- Provide a baseline for periodical review and monitoring.

Representation ID: REP/117/HRARepresentor Details:

Representor ID:	REP/117
Name:	Emma Creighton
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Habitats Regulation Assessment
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Justified
Representation:	
I think a conservation report should be carried out on tide mills. There are a number of birds that frequent the area and could be harmed by a road through their natural habitat.	
What changes do you suggest to make the document legally compliant or sound?	
Scrap all plans for tide mills and listen to the local people instead of industry.	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Representation ID: REP/215/HRARepresentor Details:

Representor ID:	REP/215
Name:	Pippa Hildick-Smith
Organisation:	
Consultation Body:	General
Stakeholder Type:	Member of the public

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Habitats Regulation Assessment
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Positively Prepared Not Justified Not Consistent with national policy
Representation:	<p>Land at Manor Nursery (adjoining the bridleway of Theobalds Road) was habitat for bats, deer, owls and had ancient trees on it. A developer completely cleared the site a couple of months ago and AFTERWARDS got an ecological survey done - which clearly is not going to show any evidence of all the wildlife which used to reside on this land. So</p>

much for any "habitat" assessment!

It is impossible to explain just how much devastation this action caused. The site has NEVER had residential housing on it and whilst the developer may make an application for this any heavy plant machinery would find access to the site extremely difficult if not impossible.

This site adjacent to our ancient bridleway is not being protected by the council currently.

What changes do you suggest to make the document legally compliant or sound?

Protection of land adjacent to the ancient bridleway of Theobalds Road is urgently needed.

Do you consider it necessary to participate at the Examination in Public? Yes

Why do you feel it is necessary to participate at the Examination in Public?

I don't feel that East Sussex have the slightest interest in areas on their periphery (such as Theobalds Road) apart from proposing that such land is suitable for housing without even considering the impact and consequences of their suggestions.

Representation ID: REP/454/HRA

Representor Details:

Representor ID:	REP/454
Name:	Robin Walker
Organisation:	Theobalds Road Residents' Association
Consultation Body:	General
Stakeholder Type:	Residents Association

Agent Details:

Name:	
Organisation:	

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Habitats Regulation Assessment
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Positively Prepared Not Justified Not Effective
Representation:	
Habitats Regulation Assessment	
1.19 The HRA includes the Ashdown Forest SAC/SPA (AFSPA) in the assessment; the	

<p>map of the 7km radius away from the AFSPA covers a small part of LDC's North Eastern area, whilst the 14km radius goes well into West Sussex and covers all of Haywards Heath and most of Burgess Hill. The 7km radius does not impact almost all of LDC's area north of the South Downs park area (i.e. the area covered by LPP2).</p>	
<p>What changes do you suggest to make the document legally compliant or sound?</p> <p>The full 7km radius should be taken into account and efforts be made to identify other sites outside this area.</p>	
<p>Do you consider it necessary to participate at the Examination in Public?</p>	<p>No</p>
<p>Why do you feel it is necessary to participate at the Examination in Public?</p>	

Housing Policy Context - Omission Sites

Representation References: OM

Representation ID: REP/291/OMRepresentor Details:

Representor ID:	REP/291
Name:	
Organisation:	EA Strategic Land LLP
Consultation Body:	General
Stakeholder Type:	Developer/Landowner

Agent Details:

Name:	Leo Scarfe
Organisation:	Iceni Projects

Contact Details:

Email Address:	
Address:	

Representation:

Policy/Section:	Housing Policy Context, Omission Site
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	No Not Positively Prepared Not Consistent with national policy
Representation: (SEE PDF FOR FULL REPRESENTATION)	
What changes do you suggest to make the document legally compliant or sound? 	
Do you consider it necessary to participate at the Examination in Public? Yes	
Why do you feel it is necessary to participate at the Examination in Public? 	

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Flitcroft House
114-116 Charing Cross Rd
London WC2H 0JR
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

Planning Services
Lewes District Council
Southover House
Lewes
BN7 1AB

5th November 2018

Dear Sir/Madam,

Representations to Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD pre-submission (Regulation 19) Consultation | Land East and West of A275, North of Cooksbridge

On behalf of our client, EA Strategic Land LLP ('EASL'), we write in response to Lewes District Council's Local Plan Part 2 Site Allocations and Development Management Policies pre-submission (Regulation 19) document (consultation document) to promote the redevelopment of the land at east and west of A275 at Cooksbridge (The Site) as shown in the enclosed site location plan. EASL have a long-standing interest in land in Cooksbridge and is working collaboratively with stakeholders to bring forward a sustainable urban extension to the existing settlement.

These representations focus on the matters of housing need and delivery; the sustainability, suitability and achievability of the Site at Cooksbridge for residential use. These representations provide commentary relating to the overall soundness of the consultation document and the proposed allocation of housing in contrast to the identified need.

a. Lewes District Council Housing Need and Delivery

The Housing Policy Context set out within the 'Consultation Document' explains that Spatial Policies 1 of the adopted Local Plan Part 1 (2016) identifies the housing requirement for Lewes District as being 6,900 net additional dwellings (345 dwellings per annum). This relates both to the plan area and part of the District falling within the National Park.

Strategic Policy 2 demonstrating that 6,926 net dwellings can be provided over the course of the Plan period and treats this in effect as the requirement for the district as a whole. The Council also seeks to suggest that of the 6,926 homes figure, the proportion of housing to be delivered outside the National Park is 5,494 net additional dwellings over the Plan period, amounting to a housing requirement of 275 dwellings per annum, with the remaining 1,432 dwellings (72 dpa) being provided within the South Downs National Park.

The Consultation document identifies that of the Part 1 Plan housing requirement of 5,494 dwellings, the supply as at April 2015 was as follows:

- 2,216 dwellings – Built or committed as at 1 April 2015;
- 1,073 dwellings – Housing supply from strategic allocations;
- 468 dwellings – Supply from windfall allowance; and
- 77 dwellings – Supply from rural exception sites allowance.

The above equates to a total of 3,834 dwellings.

This leaves 1,660 dwellings to be allocated in the emerging Stage 2 Local Plan. The consultation document explains that this will be accounted for by 1,250 dwellings through adopted or emerging Neighbourhood Plans and the remaining 432 dwellings as residual housing growth which is to be identified within the Local Plan Part 2. Of this number, some need to be met within specific settlements as per Policy SP2, whilst the location of 200 dwellings are still yet to be determined.

The requirements of the National Planning Policy Framework

It is acknowledged that, the Regulation 19 Consultation document has been prepared under the National Planning Policy Framework (NPPF) (2012), which sets out the overriding principle to achieve “sustainable development.”

When examining the soundness of a Local Plan the NPPF (2012) explains under paragraph 182 that Plans must be:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be based on the most appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

This is a requirement that has been carried forward under Paragraph 35 of the adopted NPPF (2018).

Although it is appreciated, under Paragraph 214 of the NPPF (2018), that ‘the policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019’ should the Independent Inspector, find the submitted Local Plan Part 2 document to be unsound then, given the amount of dwellings which are found to be required under the draft standardised housing methodology, it is likely that Lewes District Council will be required to allocate even more suitable and sustainable land for residential purposes, in order to deliver their increased OAN.

Given that by their own admission, Lewes District Council accept that they are unable to demonstrate a five-year housing land supply against the Council’s Objectively Assessed Housing Need, the consultation document, when viewed against the requirements of the NPPF, should be seen as unsound. It is therefore imperative that in order to fulfil their requirements, Lewes District Council revisit the ‘Residential Site Allocations’ and Housing Policy Context chapters of the draft Local Plan Part 2 document and seek further opportunities to allocate more suitable, sustainable, available and achievable sites for residential purposes.

b. Housing Land Supply

Icen accepts that the purpose of the Part 2 plan is to meet the housing requirement set out in the Part 1 plan. It is not to re-examine the housing requirement.

However we would comment that the Part 1 housing requirement is a **minimum figure** and thus where there are sustainable sites that can be allocated, they should be. This is particularly relevant given that the Part 1 did not meet Lewes District’s OAN – the plan requirement of 345 dpa falling substantively short of the OAN of 520 dpa (see Inspector’s Report Para 22). In this context it is clear that every effort should be made to identify and bring forward additional sustainable sites.

In respect of the land supply put forward within the Plan, Iceninoes the following:

1. Windfalls

Windfall sites, by definition, refer to sites which become available for development unexpectedly and therefore not included as allocations within the Council's development plan nor an adopted neighbourhood plan. We accept that the windfall numbers and the rural exception site allowance have been tested and accepted in the Part 1 Plan Examination.

2. Requirement and Supply

The Council has calculated the level of provision to be made in the Part 2 plan by taking the requirement, and totalling the supply expected to come forward from completions/commitments, strategic allocations, the made neighbourhood plans and emerging neighbourhood plans. This results in a figure of 127 dwellings (Table 4). Set against this, the plan proposes the allocation of 132 dwellings.

The position taken provides no flexibility in supply. It is typical for local plans to make provision for sites above the requirement figure, to take account of delays in some sites coming forwards or non-implementation. The approach adopted provides no provision for this flexibility. No contingency is allowed for in the event that the delivery of some sites is delayed, or the emerging neighbourhood plans fail to make provision for 865 dwellings which in itself is a significant assumption. In this respect, the plan is not effective.

Iceninoes that the 'Lewes District Five Year Housing Land Supply Position as at 1 April 2018' confirms that "the District as a whole has a supply of deliverable housing land equivalent to 4.99 years outside of the South Downs National Park (calculated via the Liverpool Method), and therefore unable to demonstrate a five year housing land supply; and a supply of deliverable housing land equivalent to 4.92 years inside the South Downs National Park Area. This highlights the need to bring forward additional housing supply to provide sufficient to deliver the level of housing needed, and points to an under-delivery against the constrained requirement.

This requirement is intensified, given that sites such as the proposed development at Marina Fort Road, Newhaven have been allocated since 2003 with still no sign of development coming forward and current marketing material anticipating that development on the site is not likely within the next five years. The five year land supply should be reviewed, and additional sustainable sites brought forwards.

Lewes District is evidently facing challenges to meet their housing requirements and deliver their OAN within the defined settlement boundaries. These challenges are intensified by physical barriers with the District being constrained to both the south and north, by both the sea, and the South Downs National Park, respectively. To help relieve some of this pressure EASL believe that Cooksbridge should be considered as an extension to the Lewes Housing Market as it provides sustainable opportunities to deliver additional housing to go towards the Council's housing shortfall against its OAN and to provide the required flexibility of supply to deliver the Part 1 Plan requirement. The site has the ability to deliver more than the 30 dwellings allocated with the emerging Local Part 2 document.

The site is a sustainable location for new housing. Public transport connections between Lewes and Cooksbridge will enable residents to be able to travel quickly and easily between the two settlements. Cooksbridge can therefore accommodate a proportion of Lewes' housing needs to relieve the pressure on the settlement and make efficient use of Cooksbridge's underutilised transport nodes.

c. Proposed Development of land at land at east and west of A275 at Cooksbridge

The Site extends to cover approximately 10ha in size and consists of land located to the north east of Cooksbridge. The site is approximately 150m from the existing Cooksbridge train station and is split into two parts with the A275 intersecting through the site.

At a proposed density mix of 35 dwellings per hectare, it is suggested that the site is suitable and available to deliver 150 dwellings to go towards the District's required housing need. Development of the site would also go towards, improved surface water drainage, provide a mixed-use hub including new shops for the local community and new drop-off facilities for Hamsey Community Primary School. In addition to this, it is expected that the development of circa 150 units in this location will lead to train service improvements from Cooksbridge Station providing a more regular connection for the local community to London Victoria and Lewes. It is also proposed that through sensitive design and a careful choice of materials, a new entrance to the village from the north, via the site, could be established to help ease traffic congestion between South Chailey and Cooksbridge.

d. Sustainability of the Site

The Site, is located adjoining an existing settlement and can be deemed to be highly sustainable location for the provision of dwellings. The following sub-sections provide an overview of the factors which improve the sustainability of the site.

Railway station

Cooksbridge Railway Station is located at the heart of the settlement and around 170m from the south of the site. The station provides regular services both towards Lewes, Ore, Eastbourne, Hastings and London Victoria. Equally, with sustainable development Cooksbridge is capable of becoming a destination in its own right and has a school that is capable of serving a wider catchment than just the settlement.

The Hamsey National Plan identifies, at section 10.4 that the community are seeking to secure at least one stopping service at Cooksbridge station per hour, 7 days per week, as well as more bus services running on evenings and weekends. An increase in population within the settlement through further development would help the community to secure these fundamental increases in train and bus services.

Bus Stops

The settlement also benefits from bus stops, which provide services into Lewes, as well as to other nearby villages and towns including Uckfield, Newick, Barcombe Mills, and Barcombe Cross, where a range of services and shops can be accessed.

These good bus links provide future residents with the opportunity to travel to work or education by sustainable transport methods and will help to ensure the services are well-used and maintained.

School

The settlement has an educational establishment which has been assessed as a 'Good' school in its most recent Ofsted Inspection. The fact that a community primary school is located in the settlement means that future residents with children will not need to travel long distances to take children to school, and again, the increase in population in the settlement will help to ensure the school remains operational.

Hamsey Neighbourhood Plan

The Hamsey Neighbourhood Plan also identifies the settlement of Cooksbridge as a suitable location to direct future housing growth within the Parish. The Hamsey Parish Neighbourhood Plan, which was adopted in 2016, directs development toward major transport hubs. The text at paragraph 5, Objectives, specifically lists Cooksbridge Railway Station as one of these notable 'transport hubs'. In addition to this, 78% of those who took part in the Neighbourhood Plan Survey (section 7.5 of the Neighbourhood Plan) agreed that development in the Parish should be concentrated in Cooksbridge so as to maintain the rural character of the rest of the Parish. The Neighbourhood Plan is therefore fully supportive of directing development to the settlement and the redevelopment of the land at Cooksbridge should be further considered.

e. d. High quality scheme

This sub-section provides commentary on the work which has gone into the preparation of the proposed draft scheme at this site, and the specific matters which have been considered in the design stages in order to demonstrate the sustainability, suitability, availability of the site. The site is also available for development due to EASL's long-standing interest in the land.

Policy DM34 of the Local Plan Part 2 Consultation document highlights Cooksbridge as an area of established character stating that "Development within this location will be permitted where it reflects the existing character of the area in terms of the gaps between buildings, building height, building size, site coverage set back from the street, boundary treatments mature trees, hedges and grass verges.

Proposed development of this Site will ensure that the Cooksbridge Character Area is protected with the high-quality design reflecting the existing character and ensuring the requirement of Policy DM34 are met.

Technical Reports

In order to show objectively the suitability of the site for the development of housing, EASL have commissioned the preparation of a Flood Risk Assessment, Ecological Assessment and draft Landscape Visual Impact Assessment (prepared by PLACE), the later of which is enclosed for your reference.

Firstly, the Flood Risk Assessment has determined that the site is not at risk from flooding, meaning the site is suitable for residential development.

Secondly, the Ecological Assessment has given an insight into potentially ecologically important aspects of the site which has subsequently been used to influence the design of the scheme. A small amount of hedgerow along the south eastern boundary of the site is thought to be potentially important hedgerow, and thus is proposed for retention in the proposals.

Finally, the draft Landscape and Visual Impact Assessment (LVIA) provides insight into how the redevelopment of the site would sit in relation to the nearby South Downs National Park. It is important that this was carried out so as to distinguish whether the redevelopment of the site is feasible in relation to the nearby South Downs National Park.

The draft LVIA assessed 14 views into the site and assesses the type of view (distance), the receptor type, view quality, susceptibility to change, value of view, and sensitivity. Two of the views were confirmed to have no view of the site. 6 of the views were considered to have low quality views of the site, and 6 were considered to have moderate quality views. The remaining two views deemed to be high quality. However, through further assessment, this is considered to be of low value. This is due to both of these locations having existing uses which are not necessarily there to enjoy views – they are from a large junction, or from a narrow lane with no footpath.

The draft LVIA provided the following conclusions:

Boundaries of the scheme

The preparation of the technical reports has enabled us to understand the sites' strong natural boundaries including the areas at risk of flooding to the immediate north, as well as the tree belt which bounds the site to the north and east.

The constraints surrounding the site meant that strong, natural boundaries exist. This means further expansion of the village is unlikely to occur, even if the subject site is redeveloped.

Master-planned Improvements

The sustainability of the site has been covered above; however, planned improvements to the site, and consequently the settlement, will aid in improving the sustainability of this location further.

Within the proposed scheme shops are proposed to be included; the provision of local shops will enable existing and future residents to access everyday services and amenities without the need to travel long distances by car or public transport. This will not only benefit residents who are already living there as well as future residents.

South Downs National Park

The redevelopment of the site will not have any detrimental impact on the South Downs National Park. The settlement of Cooksbridge is bounded to the south by the South Downs National Park. This therefore means that the most desirable location for the expansion of the village is to the north as this would cause the least impact on the National Park.

It is also important to consider that a large amount of the District is located within the South Downs National Park, which restricts the amount and form of development which can be provided by the Council. Lewes District Council should therefore consider sustainably located sites which are not situated within the South Downs National Park as having the potential to meet and exceed their housing requirements.

Phasing

The provision of these sustainably located dwellings can be phased over a number of years within the emerging Local Plan period. This will help to ensure the Council have a consistent and reliable delivery of housing over the Plan period. Given that there is uncertainty over a number of strategic sites allocated within the Council's consultation document, EA Strategic Land consider that this approach is extremely important for Lewes District Council to favour.

f. Conclusion

Having reviewed Lewes District Council's Local Plan Part 2 Site Allocations and Development Management Policies pre-submission (Regulation 19) document, EA Strategic Land are of the opinion that the Plan is currently unsound as there is insufficient flexibility in the overall housing supply, that the plan has not been positively prepared in seeking to find additional sustainable sites consistent with the treatment of the housing requirement as a minimum, and the evidence does not suggest that the Council currently have a five year housing land supply.

Given the above, it is imperative that, in order to fulfil their requirements, Lewes District Council revisit the 'Residential Site Allocations' and Housing Policy Context chapters of the draft Local Plan Part 2 document and seek further opportunities to allocate more suitable, sustainable, available and achievable sites for residential purposes.

To help relieve some of this pressure EA Strategic Land believe that Cooksbridge should be considered as an ideal location to provide an extension to the Lewes Housing Market as it forms sustainable opportunities to deliver additional dwellings to go towards the Council's housing shortfall.

EASL have had a long standing interest in land located to the east and west of the A275 at Cooksbridge and for sustainable reasons including: the provision of an existing railway station, bus stops, primary school and identification within the adopted Hamsey Neighbourhood Plan that Cooksbridge is suitable for housing, it is proposed that this Site is suitable, achievable and available to deliver up to 150 dwellings to help go towards meeting the Council's OAN and required housing land supply.

Necessary provisions have been taken, through the preparation of initial technical assessments, to demonstrate how a high quality designed scheme, which takes into account and overcomes all potential site constraints, could be delivered in this location. Further detail of how this can be achieved can be found within the enclosed draft LVIA prepared by PLACE.

EASL respectfully request that Lewes District Council revisit the Residential Site Allocations section of the Regulation 19 Local Plan Part 2 document and consider the land east and west of the A275 at Cooksbridge for residential allocation.

We trust that the above comments can be incorporated as part of the Council's Draft Local Plan Part 2 consultation exercise and we would be grateful for confirmation that these representations have been received. EASL also confirm that they would like to be involved in future stages of the plan-making process, including attendance at EIP. We trust that the information provided is sufficient at this stage, however, should any additional information be required then please do not hesitate to contact me on 02034354227/ lscarfe@iceniprojects.com.

Yours Faithfully,

A large black rectangular redaction box covering the signature area.

Leo Scarfe MRTPI

Senior Planner

The map shows a large area outlined in red, which is the subject of the planning application. This area is situated to the north and east of the town of Cooksbridge. To the south of the red-outlined area, the town of Cooksbridge is depicted with various buildings and infrastructure. Key locations include:

- Hamsey Community Primary School**: A large building complex in the center of the town.
- Playing Field**: A large open area to the east of the school.
- Sewage Pumping Station**: Located near the top right of the red-outlined area.
- Railway**: A railway line runs along the bottom left of the map, with several buildings and structures nearby.
- Buildings and Structures**: Various other buildings are labeled, including 'Timber Store', 'Four Winds', 'Willingham Cottages', 'Park Lodge', 'Honey Hill', 'Leryn', 'Redknap', 'Elm Cott', 'Shelter', 'LB', 'Tob', 'Works', 'Railway Cottages', 'Willow Cottage Tree Cott', 'STATION MEWS', 'Old School House', 'School House', 'El Sub Sta', and 'Hamsey Community Primary School'.
- Paths and Roads**: Several paths and roads are shown, including 'Path (un)', 'Path (u)', and 'Cooksbridge'.
- Scale and Orientation**: A scale bar at the bottom left indicates distances from 0m to 150m. A north arrow is located in the top left corner.
- Other Features**: A '15.3m' measurement is noted near the top right. A '1' is marked on a path on the right side. A '1' is also marked on a path on the left side.

PLACE

Design+Planning

Cooksbridge

Landscape and Visual Impact
Assessment

June 2017

633_DO_001 - Part I

DRAFT



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APPENDICES (Refer to Document Part II)

1.0 INTRODUCTION

- 1.1 This document has been produced to accompany an outline Planning Application for the construction of a new housing development on the northern periphery of Cooksbridge village. This report has informed the design proposals for the site masterplan and the landscape strategy as set out in the Planning Application Design and Access Statement.
- 1.2 The site sits on either side of the A275 on the northern edge of Cooksbridge defined in planning documents as 'New Cooksbridge'. The site is currently open land and presently forms the open gap between 'New Cooksbridge' and 'Old Cooksbridge' as defined in the Old Cooksbridge Conservation Area. It is composed of two fields, defined by historic field boundaries which can be traced back to the 18th Century. These records define the field to the west of the main road as 'Cow Field' and the field to the east as 'The Cromps'. The north boundary is further defined by an area of seasonally flooding marsh grazing land and the North End Stream historically known as Tanner's Lagge. The site essentially rises up from the flood plain (14.00 AOD) to the higher (20.00 AOD) dry land of the village edge on the sites southern boundary.
- 1.3 The size and scope of the proposed development is not expected to require an Environmental Impact Assessment (EIA). The Local Planning Authority (LPA) are yet to issue a screening opinion. We will be submitting this Landscape and Visual Impact Assessment (LVIA) to support an Outline Planning Application.
- 1.4 The receptor locations were selected by a desktop analysis of the local topography and features, with views subsequently assessed on site by two chartered landscape architects. The following report has been prepared following the methodology in Guidelines for Landscape and Visual Impact Assessment 3rd Edition published by the Landscape Institute.
- 1.5 The LVIA has influenced the approach to the site planning of the proposed development scheme. The landscape design proposals, which complement the mainly residential scheme, mitigate the visual impact of development in the landscape. They provide a landscape framework, based on indigenous vegetation, to integrate the scheme into the local context. Careful consideration has been given to the floor levels of development in relation to the site topography, building massing and building heights to ensure the development sits sympathetically within the wider landscape setting. The assessed effects on various receptors is based on the site plan and assumptions with regard to issues such as the colour and texture choice of building materials. The potential to retain existing mature trees and hedgerows within the new layout has also been considered along with the wider visual impact of the development.
- 1.6 For the purposes of this report the 'site' is defined by the planning red line boundary and includes the development of housing, access roads, sustainable urban drainage features and community infrastructure, such as play areas.

2.0 PLANNING POLICY CONTEXT

This document has prepared in response to principles set down in national and local planning policy and particularly in response to the following documents and designations relevant to landscape masterplanning at this site.

- The National Planning Policy Framework
- The Lewes District Council Local Plan
- Hamsey Parish Policy
- Hamsey Neighbourhood Plan
- South Downs National Park
- Offham Marshes SSSI
- Clayton to Offham SSSI
- Lewes District Council Flood Plan

National Planning Policy

- 2.1 The National Planning Policy Framework (NPPF – 2012) sets out the Government’s economic, environmental and social planning policies for England, which include a presumption in favour of sustainable development.
- 2.2 The NPPF strengthens the importance of design in the built environment, stating as one of its overarching core principles (paragraph 17) that planning should

“always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;

- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.”
- 2.3 Paragraph 17 - promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk, mitigation, carbon storage, or food production);

Technical Guidance to the National Planning Policy Framework

The NPPF incorporates a number of elements on flood risk and flood management and this is relevant to this site. The policy affords protection to the fields between Old Cooksbridge and New Cooksbridge. These wet meadow fields such as Tanner's Lagge, and the field to the north east of the site form part of Flood Zone 2 and Flood Zone 3 defined by the Environment Agency and further defined as part of the Lewes District Flood Plan, and under the policy not to be developed. The result of this is a low level area adjoining the site which will always remain open in aspect, contributing a rural riverine character to this edge of the site, and an open aspect contributing to high visibility of the northern site boundary.

Local Planning Policy

2.4 The Local Planning Authority is Lewes District Council (LDC).

2.5 The LDC Local Plan, the core strategy which was adopted 11th May 2016 and sets out the policies for guiding and determining development in the district. This is a joint strategy drawn up in tandem with South Downs National Park for the period 2010-2030. Relevant Policies reviewed as part of this assessment include:

Spatial Policy 1 – Provision of Housing and Employment

Spatial Policy 2 – Distribution of housing

Core Policy 1 - Affordable housing

Core Policy 8 - Green Infrastructure

Core Policy 9 – Air Quality

Core Policy 10 - Natural Environment and Landscape

Core Policy 12 – Flood Risk, Coastal Erosion and Drainage

2.6 **Local Plan Policy** – Saved Policies from the 2003 Local Plan

The following policies were saved from the 2013 LDC Local Plan and are referenced directly by the New Cooksbridge plan in the current LDC Local Plan Core Strategy. These define the council's commitment to encourage sustainable, sensitive and functional design of appropriate density, to protect statutory landscape designations and manage rural issues such as light pollution, parking provision for transport nodes, traffic management, employment and play provision.

ST3 - Development requiring planning permission will be expected to comply with the following criteria, and be supported by justification statements where necessary:

(a) development should respect the overall scale, height, massing, alignment, site coverage, density, landscaping, character, rhythm and layout of neighbouring buildings and the local area more generally

(b) materials should be of a quality, type, colour and design which is appropriate to the character of the local area

- (c) development, including conversion, should respect the amenities of adjoining properties in terms of noise, privacy, natural daylight, and visual amenities and smell
- (d) development should not result in detriment to the character or the amenities of the area through increased traffic levels, congestion or hazards, noise levels and other environmental considerations
- (e) access, circulation and parking to the development shall be provided in accordance with the policies in the Transport and Communications chapter. The site should be capable of accommodating the required parking provision without detriment to the visual amenities of the area through over intensive parking in a prominent position
- (f) development should not result in the loss of significant buildings, public views or spaces between and around buildings, or trees or other landscape features which make an important contribution to the character of the area
- (g) the design of hard and soft landscaping in spaces around buildings should enhance and complement new development where appropriate and should maximise wildlife potential by the use of native species and appropriate design in accordance with Policies ST11 and ST12
(Policies ST11 and ST12 were not saved in the LDC 2016 Core Strategy)
- (h) development should consider the enclosure of spaces around buildings and should be designed to take account of overlooking, microclimate and the function of such spaces
- (i) in exposed locations, such as seafronts, materials used in new development will normally be required which have been demonstrated to be durable in comparable conditions and which complement locally used materials
- (j) development should seek to maximise the efficient use of energy, resources and materials through the influence of factors such as design, housing type, orientation, location and construction methods.

ST7 - Details of any external lighting required as part of any new development should be submitted with the planning application. Planning permission will not be granted unless the District Council is satisfied that the proposed lighting scheme is the minimum necessary for security and working purposes and that it minimises potential pollution from glare and spillage.

ST9 -The Council will seek to safeguard (and wherever possible enhance) the intrinsic qualities of sites which are of importance for their nature conservation, geological or landscape interest, having regard to:

- (a) the particular quality of the features on the site, including their rarity value and any factors giving rise to special international, national or local designations
- (b) the extent of any adverse effects on the above features stemming from the proposed development, and

(c) the extent and effectiveness of any proposed mitigation or compensation measures aimed at enhancing, retaining or recreating habitat or landscape features on or off the site

In negotiating development proposals the Council will, where appropriate, seek to secure the effective management of sites through the imposition of conditions or the creation of planning obligations

RES4 - All residential development (both large and small) must make an efficient use of land, and development will not be permitted at a density of less than 30 units per hectare unless there are significant site constraints or character considerations that make this figure unattainable.

RES19 - In areas where there is a deficiency of outdoor sports and/or children's play space in quantitative or qualitative terms as identified in the Topic Paper "Outdoor Playing Space in the Lewes District", planning applications for all residential development will be expected to include a level of provision for outdoor sports and/or children's outdoor play space in accordance with the standards set out in Policy RE1.

H5 - Planning permission and/or listed building consent will be granted for developments within or near to Conservation Areas, provided that they:

- (a) conserve or enhance the special architectural or historic character or appearance of the area and re-instate historic elements wherever possible
- (b) do not require the demolition or partial demolition of any unlisted building(s) which make a positive contribution to the character or appearance of the area
- (c) use materials which are traditional to the area or are otherwise sympathetic to the character of the particular building or site
- (d) respect the design of the existing buildings of the area
- (e) respect any important traditional groupings of buildings which contribute to the character of the area
- (f) protect open spaces, trees and significant public views, and
- (g) comply with the criteria in Policy ST3

T3 - The District Council will resist the loss of parking on sites at or near to stations (as identified on the Proposals Map) and will encourage the improvement of the quality and quantity of car parking and secure cycle parking to serve stations.

T5- Development in the rural area will be carefully considered in terms of the traffic generation implications of the development. This will take into account technical capacity, safety and environmental impact and effect on the rural character of the area.

2.7 Hamsey Parish Policy

22.5 The Topic Paper “Outdoor Playing Space in the Lewes District”, updated August 2000, identifies a shortfall within Hamsey of Informal Play Space and Equipped Play Areas. Any new housing would exacerbate this shortfall. Due to this, any developers of unidentified housing sites will be expected to contribute towards outdoor playing space as specified under District Wide policy RES19 (Provision of Outdoor Playing Space). “

22.3 In order to protect the rural setting of the village, it is important to resist outward encroachment of development into the surrounding open countryside. A major issue that detracts from the ambience and atmosphere of the conservation area is the busy traffic which passes through along the main roads, often at high speeds. This may in time lead to pressure for additional signs or speed control methods, and it will be important that any such methods are mindful of the potential effects on the character and appearance of the conservation area.

“22.10 An Area of Established Character has been identified in Cooksbridge to the west of the A275 and south of the railway line (See Inset map No 12a). District –Wide Policy H12 will apply to this area.”

22.11 The area is characterised by spacious plots with rich, mature vegetation and trees. The large houses are a mixture of styles and age and are set well back from the road.

2.8 Hamsey Neighbourhood Plan

2.9 The Neighbourhood plan can be referred to at:

[http://www.lewes.gov.uk/Files/Plan_Hamsey_Neighbourhood_Plan\(1\).pdf](http://www.lewes.gov.uk/Files/Plan_Hamsey_Neighbourhood_Plan(1).pdf)

2.10 The Hamsey Neighbourhood Plan is very similar to the Local and Parish Plan and has much overlap with the other policies but is developed by the local community itself. The neighbourhood plan is not a statutory document but is prepared by local community members to directly identify their concerns and aspirations. Beyond the issues outlined in the above policies, the neighbourhood plan highlights the community’s aspirations for instance, to have trains stop at Cooksbridge on the weekend, to improve play and well-being provisions, such as having more benches to sit on outdoors in public space, to have a safe cycle path running along the A275 or to have a village shop where local people can buy local produce. The plan also outlines the communities wish to maintain areas of biodiversity or of tranquillity and maintaining the rural character of the villages generally.

2.11 Refer to ICENI Planning Statement for more information (To be completed)

Landscape Designations

2.12 National Parks

2.13 Cooksbridge is located on the Eastern border of the South Downs National Park (SDNP), in East Sussex (Refer to Appendices, Figure.). The South Downs National Park was designated in 2010 and contains over 1600 km² of varied landscape; from the chalky escarpments of Beachy Head to the undulating hills and ancient woodlands of the Low Weald. It stretches from Winchester in the west through medieval towns and hamlets to Eastbourne in the east.

2.14 The national park reaches the edge of the settlement of ‘New Cooksbridge’ but diverts around the settlement boundary of Cooksbridge to the south thus excluding Cooksbridge and the

proposed development from the administrative boundaries of the National Park. Despite this administrative exclusion the site and the villages of Cooksbridge and the immediate environs still enjoy many locally valued views to the South Downs, and is visible particularly from Blackcap to the south west of the site.

2.15 The landscape of the South Downs National Park itself

“has a distinct form and character due to its complex geological history. It is marked by huge variety and contrast, giving rise to a wide range of habitats including rich chalk grassland, beech hanger woodland, floodplain grassland, as well as ancient woodland, heathland, chalk streams and coastal habitats.” *from www.southdowns.gov.uk*

2.16 Sites of Special Scientific Interest

2.17 Offham Marshes SSSI – Recovering area – (1.5km from the development site)

The site is in the study area but not visible from the proposed site, however the proposed site falls within the Impact Risk Zone of the SSSI (Refer to Appendices, Figure...) and the qualities of this site bare many similarities to the lower section of the development site, particularly the northern boundary and Tanner’s Lagge. The ecology type and species bare marked similarities.

This alluvial grazing marsh supports large amphibian populations, a feature which is unusual for this type of habitat in Sussex. This is due to the close proximity of the breeding sites to the areas of suitable terrestrial habitat (woodland, scrub and fen) on the flood plain and the chalk escarpment. The site also supports several scarce dragonflies (Odonata), beetles (Coleoptera) and flies (Diptera).

The combination of seasonally flooding land and drainage ditches create a ‘Fen’ like ecology of rich alluvial soils with a mosaic of marginal and flood tolerant plant species supporting amphibian species and other dependant predator species.

2.18 Clayton to Offham SSSI – Unfavourable Recovering area. Broad Leaved, mixed and Yew woodland (1.5km from the development site)

This site is within the South Downs National Park. Part of the site is a Nature Reserve managed by the Sussex Trust for Nature Conservation.

The site looks down on the proposed development site and forms an important part of the visual backdrop when looking back south to the National Park.

This extensive site lies on the chalk escarpment and dip slope of the South Downs. The nationally uncommon chalk grassland habitat dominates much of the site but woodland and scrub is better represented here than on the other chalk sites in East Sussex. The site supports a rich community of breeding birds.

Where areas are ungrazed woodland scrub has begun to regenerate with the common native species, Hawthorn, Blackthorn, Dogwood, Spindle, Hazel and Whitebeam. The site supports a profusion of orchids. Breeding birds include Woodpeckers, Tawny Owls, Thrushes, Finchs and Tits and a number of birds of prey.

2.19 Conservation Areas

- 2.20 Old Cooksbridge Conservation Area (immediately adjoining the development site)
- 2.21 The site falls between the New Cooksbridge plan area and the beginning of the Old Cooksbridge Conservation Area. It's character is further defined and discussed in the Baseline Conditions under the Character of Cooksbridge Village. (4.18 to 4.21)
- 2.22 In the Conservation Area Appraisal under 'Key Views and Vistas' the following is highlighted:
- "From the south of the conservation area, in particular Cooksbridge Farm, there are stunning views across the open landscape to the south, and the Cook's Bridge itself is set within much more open countryside." This view has been picked up in the study and has been described and assessed in this report.

3.0 ASSESSMENT METHODOLOGY

- 3.1 The landscape and visual impact assessment identifies and assesses the likely significant effects of the proposed development on the environment with respect to landscape and visual issues. The effects have been evaluated with reference to definitive standards and legislation where available. Where it has not been possible to quantify effects, qualitative assessments have been carried out, based on available knowledge and professional judgement.
- 3.2 Landscape and visual effects are assessed separately but are presented within this report. The impact assessment follows the guidance set out in the Landscape Institute and the Institute of Environmental Assessment's "Guidelines for Landscape and Visual Impact Assessment" (3rd Edition, 2013). Paragraph references refer to this guidance. The assessment process is one of description (i.e. collecting and presenting the information about the landscape and visual resources in a systematic manner) and evaluation (i.e. attaching a value to a given landscape or visual resource by reference to specified criteria).
- 3.3 Although the guideline's publication refers to 'landscape', the European Landscape Convention definition of landscape confirms that it includes the landscapes of towns, cities and villages i.e. townscapes. So 'townscape' is defined as the landscape within a built-up area including the buildings and the relationships between them. This assessment therefore uses the generic term landscape for both landscape and townscape.
- 3.4 In order to predict and evaluate impacts, it is necessary to have detailed baseline information of the existing landscape and visual resource. It is also relevant to understand the cumulative landscape effects resulting from "the nature of other projects to allow their landscape effects to be predicted and described. This will allow the effects of the main proposal being assessed to be set alongside these other additional projects and their cumulative effects identified..." (para 7.25)
- 3.5 Combined effects "may result from changes in the content and character of the views experienced in particular places due to introduction of new elements or removal of damage to existing ones. (7.29)
- 3.6 The baseline study extends beyond the site and covers the whole of the area from which the proposed development would be visible, generally within a 2km wide study area, and additionally from the high point of Black Cap. The assessment includes desk study, field survey and analysis, involving comprehensive and extensive site and surroundings walkover visits. The baseline study also explores patterns and scale of landform, land cover and built development and includes any special historic and cultural values and specific potential receptors of landscape and visual effects, such as important components of the landscape, and pedestrians or motorists (i.e. available views from footpaths, public open spaces and roads).
- 3.7 Baseline conditions have been assessed through an appraisal of the following:
- General character of the area, including the landscape and built form context;
 - Site components including the condition and quality of existing landscape features;
 - Visual context of the site
 - Relevant landscape policies, at the national and local levels.

- 3.8 Landscape and visual assessments are separate, although linked, procedures. The landscape baseline, its analysis and the assessment of landscape effects all contribute to the baseline for visual assessment studies. Visual effects are assessed as one of the interrelated effects on population.
- 3.9 Landscape effects derive from changes in the physical landscape, which may give rise to changes in its character and how this is experienced. This may in turn affect the perceived value ascribed to the landscape.
- 3.10 Visual effects relate to the changes that arise in the composition of available views as a result of changes to the landscape, to people's responses to the changes, and to the overall effects with respect to visual amenity.
- 3.11 The assessment of likely significant effects aims to:
- Identify the likely effects of the development;
 - Indicate the measures proposed to avoid, reduce, remedy or compensate for those effects (mitigation measures);
 - Estimate the magnitude of the effects; and
 - Provide an assessment of the nature and significance of these effects.

Approach to Landscape Assessment

- 3.12 Landscape receptors with the potential to be affected by the proposed development have been identified; these include Landscape Character Areas, designated townscape features (such as listed buildings), public open spaces, transport routes and the application area itself. Once identified a subjective, professional analysis can be made of all available information to interpret landscape quality.

3.13 For the purposes of the baseline study, the overall quality of the landscape is summarised and defined below.

Table 1.0 - Quality of Landscape

Scale	Quality of Landscape
High	Has valued features that are significant in the context of the surrounding area, with distinctive components and structure. These landscapes are considered to be of particular importance to conserve and may be particularly sensitive to change. The area possess a particularly distinctive sense of place and its value is nationally recognised
Medium	An area with a clearly defined sense of place and/or character in moderate condition; and or an area valued at a local or regional level, and/or a landscape which is partially tolerant of the type of change identified without undue harm
Low	An area with a weak sense of place and or with poorly defined character and or in poor condition, often not valued for its scenic quality, and or an area that is tolerant of substantial change of the type proposed without undue harm

3.14 Effect significance is summarised as follows

Table 2.0 - Effect Significance Landscape

Effect	Description
Major Beneficial	The development would be complementary with the scale, landform and pattern of the landscape and would provide a substantial benefit to the landscape.
Moderate Beneficial	The development would fit well with the scale, landform and pattern of the landscape and maintain or enhance the existing character.
Minor Beneficial	The development would complement the scale, landform and pattern of the landscape whilst maintaining the existing character.
Negligible	The development would cause very little change from baseline conditions and the change would be barely distinguishable, approximating to a no change situation.
Minor Adverse	The development would cause minor permanent and/or temporary loss or alteration to one or more key elements of the landscape, including the introduction of elements that are prominent, but may not be uncharacteristic of the surrounding landscape.
Moderate Adverse	The development would cause moderate permanent loss or alteration to one or more key elements of the landscape, including the introduction of elements that are prominent, but may be uncharacteristic with the surrounding landscape.
Major Adverse	The development would cause total loss or major/substantial alteration to key elements features of the landscape (pre-development) such that the post development character/composition/attributes will be fundamentally changed.

Visual Baseline Methodology

- 3.15 The assessment also includes a visual appraisal of the study area i.e. the whole of the area from which the proposed development would be visible. Using topographical data including OS 1:25,000 mapping and onsite survey work the approximate extent to which the development would be visible is considered to be approximately 2 kilometres wide, and therefore the wider baseline study area has been determined as 2 kilometres from the site with the one exception of an identified view at 2.5km away in the National Park, within the Black Cap National Trust Reserve. The appraisal seeks to demonstrate views as existing from a range of viewpoints, which fall within the visual envelope from close, middle and longer distance views, including public viewpoints such as roads and open space.
- 3.16 To determine baseline visual amenity the extent and nature of existing views of the site was established and potentially sensitive receptors identified. The following procedure was adopted to achieve this:
- Analysis of topographical data including OS 1:25,000 mapping
 - Identification of landmarks and their relative heights Above Ordnance Datum (AOD) and visibility. Landmarks, and their known heights, were used in the field and when studying site photographs to assist with orientation and in an assessment of the visibility of structures of a known height;
 - A number of separate site visits by two landscape architects to identify sensitive visual receptors including users of public rights of way, residents, users of amenity open space and recreation facilities, users of public roads and railways. Baseline photography was undertaken in winter when deciduous vegetation was mostly bare.

Visual Impact Assessment Methodology

- 3.17 Visual effects, either direct or indirect, consider the changes in the character of the available views, resulting from the proposed development and changes in the visual amenity of the visual receptors (which include residents, workers, users of public open spaces, rights of way, roads and railways). A study has been carried out as part of this assessment which systematically identifies all the visual receptors that are likely to be affected by the development and seeks to assess its effect on these receptors, including their magnitude and significance.
- 3.18 An analysis of the importance and sensitivity of visual receptors was undertaken for the assessment of effects on views. Importance of views is generally considered in the context of values placed on scenes, alternatives available and the relative scenic quality. The sensitivity of the receptor and the magnitude of effect in a view are considered in undertaking the assessment of significance of effects.
- 3.19 The sensitivity of visual receptors in views will be dependent on:
- The location and context of the viewpoint;
 - The distance the viewpoint is from the site;
 - The expectations and occupation or activity of the receptor; and

- The importance of the view (which may be determined with respect to its popularity or numbers of people affected, its appearance in guide books, on tourist maps, and in the facilities provided for its enjoyment and reference to it in literature or art).

3.20 The distance from which the development is viewed, obviously affects the proportion of the view which is taken up by the development. From a distance the development may only form a small part of a wider view and therefore this affects the impact of the change on the view for the receptor. For this assessment we have defined length of view as the following:

Close Views – Less than 1km

Middle Distance Views – 1km and 2km

Long Distance Views – over 2km

3.21 The types of visual receptor and the quality of their view is considered in determining the susceptibility of a visual receptor to a change in their view:

Table 3.0 - Visual Receptor Type

Visual Receptor Type	Criteria
A	People, whether residents or visitors, who are engaged in outdoor recreation, including the use of public rights of way, whose attention or interest is likely to be focused on the landscape and on particular views Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience Communities where views contribute to the landscape setting enjoyed by residents in the area.
B	People engaged in outdoor sport or recreation which does not involve or depend on appreciation of views in the landscape People at their place of work whose attention may be focussed on their work or activity, not on their surroundings Users of retail and employment sites, sports and recreational facilities where the views are secondary to the activity at hand
C	Users of Industrial sites, agricultural land or busy commuter links where there is little appreciation of the view.

3.22 The quality of the view towards the site is defined as follows and considers the visual qualities within a view and the extent to which this site can be seen from a particular receptor.

Table 4.0 - Quality of View

Quality	Criteria
Exceptional	Where there is an open view or panoramic view of the site and the elements that make up the view are of exceptionally high scenic value, natural or man-made beauty, and uninterrupted by incongruous elements.
High	Where the view is largely un-interrupted and the view is of a good scenic value, natural or man-made beauty with few incongruous elements.
Moderate	Where the view is partially screened by intervening features, only forms part of the view or the site is in the distance. Where the view has some or few features of note but generally of no particular scenic quality or the features are in poor condition.
Poor	Where the site is largely obscured by intervening features or difficult to perceive in the distance. Or where the view would be considered by most as unsightly or in very poor condition in which case the view can be open or partially screened.

3.23 The following table can be used to consider above in determining the visual receptor's susceptibility to change in their view:

Table 5.0 - Susceptibility to Change

Type of Visual Receptor	Visual Receptor's Susceptibility To Change In The View		
A	Low	Low	Medium
B	Low	Medium	High
C	Medium	High	High
	Exceptional / High	Moderate	Poor
	Quality of the View		

3.24 The value of the view is determined through consideration of its relationship to heritage assets or planning designations or through recognition from local residents and visitors, published guidebooks or provision of facilities for enjoyment of the view.

Table 6.0 - Value of View

Value of View	Criteria
High	A recognised view within, towards or across a designated landscape or towards a heritage or locally important feature. Historic or published viewpoints either identified in published guidebooks or literature or demarcated by a physical element.
Medium	A view within, towards or across a locally important landscape or towards a locally recognised feature or reference point. A published viewpoint within local guidebooks or literature or demarcated by a physical element.
Low	A view which is not rare and does not have any local value attached to it.

3.25 The following table can be used to consider the above in assessing sensitivity of visual receptor:

Table 7.0 - Sensitivity

Value of view		Sensitivity	
High	High	High	Moderate
Medium	Moderate	Moderate	Moderate
Low	Moderate	Low	Low
	Low	Medium	High
Susceptibility of Visual Receptor to Change in the view			

The magnitude of change of the visual effect resulting from the proposed development at any particular viewpoint is based on the interpretation of a combination of factors as follows, and which are described in the table below.

- The distance between the receptor and the development;
- The extent of the development that will be seen, e.g. full, partial or glimpse;
- The proportion of the view that is affected by the development;
- The position of the development in relation to the orientation of the visual receptor;
- The context within which the development will be seen; and
- The nature and duration of the effect, whether temporary or permanent, intermittent or continuous.

Table 8.0 Magnitude of Change to Visual Receptors

	Description
Major	Dominant - The change experienced as a result of the development would dominate the existing view over a wide area, or an intensive change over a limited area.
Moderate	Conspicuous - The development would cause substantial changes to the existing view over a wide area, or noticeable change over a limited area.
Minor	Apparent - The development would cause minor changes to the existing view.
Negligible	Inconspicuous - No real change to perception of the view; hardly discernible.

Significance of Visual effects

3.26 The table below is used to guide the assessment of the significance visual effects from a combination of the assessment sensitivity and the magnitude of effects.

Table 9.0 Significance and Description of Visual effects

Effect	Description
Major Beneficial	The proposed development could cause a material improvement in a view
Moderate Beneficial	The proposed development would cause a notable improvement in a view
Minor Beneficial	The proposed development would cause a perceptible improvement in a view
Negligible	The proposed development would cause no discernible deterioration or improvement in a view. Effects are considered neither adverse nor beneficial in nature
Minor Adverse	The proposed development would cause a perceptible deterioration in a view
Moderate Adverse	The proposed development would cause a notable deterioration in a view
Major Adverse	The proposed development would cause a material deterioration in a view

Cumulative Effects

3.27 Consideration has been given to local approved planning applications or applications predicted to come forward.

3.28 Cumulative effects arise where the effects of other developments or other predicted changes are anticipated to add the effects of the proposed development being assessed. Currently there is only one major development, on an adjoining site, in close proximity to the proposal outlined below:

- LW/16/0935: Chatfields Yard Cooksbridge Road – Erection of 27 dwellings with associated landscaping, access and parking. Planning application validated 14.11.16, decision pending.

3.29 There are several other minor applications in the vicinity for extensions or alterations to residential properties. Due to the small scale development changes these will have limited to no effect on the assessed scheme.

3.30 See Cumulative Impacts drawing in the appendices for details of locations of the potential developments.

Assumptions and Limitations

3.31 It should be noted that during site visits no access to private properties or land was sought and the visual assessment is therefore based on a best assumption from publicly accessible locations outside or close to properties, as well at roads and public rights of way.

- 3.32 The study zone notes features such as boundaries formed by deciduous trees which have a variable screening effect depending upon season. Site inspection has sought to verify the effectiveness of such features in the landscape.
- 3.33 Where it has not been possible to quantify effects, qualitative assessments have been carried out, based on available knowledge and professional judgement.

4.0 BASELINE CONDITIONS

- 4.1 The assessment has been carried out in January 2017 when the screening by deciduous planting was at its least effective. The assessment specifies the nature of the proposed changes, describes the existing landscape, views and visual amenity in the area that may be affected and how those effects can be mitigated.

Site context

- 4.2 The proposed development site and study area is located at the northern edge of the village of New Cooksbridge, East Sussex. The village lies at the junction of the A275 and the Newhaven to London railway line approximately 3 miles North of the county town of Lewes, East Sussex, on series of tributaries to the River Ouse. Brighton lies 10 miles to the south west of the site and Haywards Heath 10 miles to the north west.
- 4.3 The majority of the proposed site sits either side of the A275 in two fields recorded historically as 'Cow Field' to the west of the road and 'The Cromps' to the east.

Topography

- 4.4 The site slopes down from South to North, from approximately 21.50m (AOD) to approximately 14.00m AOD. The level differences are generally distributed evenly across the site with localised depressions as the site dips down to the stream at the bottom of the site and two streams that bound the fields on both east and west.
- 4.5 The topography reinforces the setting of the surrounding buildings, generally sitting above the level of the proposed development site. The slopes and gradients are one of the defining characteristics of the site.

Rights of Way

- 4.6 Other than the A-road which crosses the site north / south there are no public rights of way within the application site or grounds. The site does however have a number of public footpaths passing around it as close as 50m and with direct line of site from the North West of the site.

Vegetation

- 4.7 The majority of the site is composed of improved grassland which shows signs of being used recently as grazing land with sporadic wet pockets particular in the lower reaches predominated by sedges and other wet grassland species. The site is defined by field boundary hedgerows in the main which from the map data available, suggest that they have been in place since at least the mid 18th century and are now species rich. To the south of Cow Field there is a large conifer hedge (approx. 10-15m tall) planted to screen / wind break the timber yard site. The North side of the site is bounded by Folly Brook and it's associated flood plain. This encompasses wet meadow and smaller sections of wet woodland (approx. 10-20m tall)

Soils and Geology

- 4.8 The area is dominated by clay soils with potential pockets lighter loamier soils. At the bottom of the site particularly towards the wet woodland on the north east corner of the site, richer alluvial soil with increased organic content will have a slightly more acid pH.
- 4.9 Site drainage is poor particularly at the bottom of the site as we approach the floodplain. Clay based soils overlying chalk geology also leads to perched water tables and spring lines. The

site is surrounded by spring points which all feed in to the North End Stream and then into the Ouse.

Landscape Character

National Landscape Character Areas

4.10 Natural England, with support from English Heritage, has undertaken a detailed review and classification of broad areas with similar landscape characteristics across England, called National Character Areas (NCAs). The study area falls between two National Character Area 125: South Downs and 121: Low Weald. Which are summarised as follows:-

4.11 NCA No.125 : South Downs

The South Downs National Character Area (NCA) comprises a 'whale-backed' spine of chalk stretching from the Hampshire Downs in the west to the coastal cliffs of Beachy Head in East Sussex; two per cent of the NCA between Eastbourne and Seaford is recognised as Heritage Coast. The majority of the area falls within the South Downs National Park, a recognition of its natural beauty and importance for access and recreation, and allowing for local decision making processes to manage this nationally important area. Some eight per cent of the NCA is classified as urban, comprising the coastal conurbation of Brighton and Hove in the east. The South Downs NCA is an extremely diverse and complex landscape with considerable local variation representing physical, historical and economic influences; much of it has been formed and maintained by human activity, in particular in agriculture and forestry. International Biosphere status was confirmed for Brighton and Lewes Downs in June 2014, securing it as the first completely new Biosphere site in the UK established for almost forty years and the first ever in south-east England.

This is a landscape of contrasts. Dramatic white chalk cliffs and downland create a sense of openness. Enclosure and remoteness can be found in woodland and even in close proximity to urban areas. This NCA provides a rich variety of wildlife and habitats; rare and internationally important species, such as the Duke of Burgundy butterfly, mature elms and rare ground-nesting birds all benefit from the characteristic mixed farming systems. Recreational activities within the NCA include cycling, walking and horse riding on the South Downs Way National Trail which follows the ridge of the northern scarp and provides extensive panoramic views. National Park status enhances the NCA's recreational opportunities.

The Brighton groundwater management unit is the principal chalk aquifer supplying Brighton and surrounding areas. It has been identified as being under significant stress and is classified as having 'no water available', as is the River Ouse water resource management unit (WRMU). The River Adur WRMU, however, is classified as having 'water available'.

In the west of the NCA, groundwater in the chalk feeds many of the rivers, streams and wetlands in the area and provides most of the water abstracted for public supply. The porosity of chalk is one of its most notable properties. Rain is largely absorbed through tiny, connected pores instead of lying on the surface and forming rivers, lakes and ponds. Rain water moves through the thin chalk soils and slowly replenishes the chalk aquifer below.

4.12 NCA No. 121 : Low Weald

The Low Weald National Character Area (NCA) is a broad, low-lying clay vale which largely wraps around the northern, western and southern edges of the High Weald. It is predominantly agricultural, supporting mainly pastoral farming owing to heavy clay soils, with horticulture and some arable on lighter soils in the east, and has many densely wooded areas with a high proportion of ancient woodland. Around 9 per cent of it falls within the adjacent designated landscapes of the Surrey Hills, Kent Downs and High Weald Areas of Outstanding Natural Beauty and the South Downs National Park. Around 23 per cent of the area is identified as greenbelt land.

The Low Weald is one of the most important of the NCA's in terms of a rich biodiversity including many rare and high quality habitats and is particularly rich protected biodiversity sites (SSSIs, SACs, Nature Reserves, etc). The area has many sites that are critical for the understanding of complex Wealden geology, including 11 geological SSSI. There are also important historical sites, many associated with the Wealden iron industry, and nearly 900 ha of Registered Parks and Gardens, with many more, smaller designed landscapes.

The area is generally wet and woody. It is dissected by flood plains and its impermeable clay soil and low-lying nature make many areas prone to localised flooding. Ponds are common, often a legacy of iron and brick-making industries.

Despite its proximity to London and continuing pressure for development, the Low Weald remains essentially rural in character with small-scale villages nestled in woodland and many traditional farm buildings.

Local Landscape Character Areas

4.13 East Sussex County Council commissioned a landscape character review in 2015 to provide a consistent landscape character assessment across the county of East Sussex.

4.14 LCA - 14:Western Low Weald:

4.15 Whilst Cooksbridge and particularly New Cooksbridge, at first impression, may not seem distinctive in detail, particularly on its periphery, they show many of the characteristics, the main ones of which are outlined below.

4.16 Key characteristics include:

- A gently undulating and low lying topography with highest points on the green sand ridges and lowest in the river and stream valleys.
- Unspoilt and distinctive rural character with few intrusive features and no large urban areas.
- Fields are generally small and irregular; many formed from woodland clearance and often bounded by remnant woodland strips known as shaws.
- A largely pastoral landscape, especially on the heavy clay soils. More used for grazing than for arable with a few exceptions as the land rises up to the south of the study area.
- Scattered tree features including distinctive mature oaks, tree belts, woods, parkland and hedgerow trees give an impression that the area is well wooded.
- Seasonal impact of carpets of celandine, wood anemone and bluebells in woodland
- Generally across the area there is a strong historic landscape structure with a patchwork of medieval assart fields and hedgerow boundaries.
- Oak and ash as predominant mature tree species in woods and hedges with field maple, wild cherry and hornbeam (coppice) also frequent, there are a few remnant mature elm trees.

Alder and willow are common in the river valleys. Lime trees and horse chestnut are frequent in designed landscapes and along roadsides.

- The flat and sometimes wide expanse of the River Ouse Valley
- Gently winding often tree lined minor river and stream valleys, most as tributaries to the Ouse.
- Scattered settlement of frequently picturesque villages and farmsteads, particularly on the Greensand ridge running parallel with the Downs.
- Distinctive vernacular buildings associated with farmsteads including many farm house barns such as the ones at Cooksbridge Farm.
- The vernacular building material for the area is timber frame and principally oak.
- Typical building materials since the late 18 century include local brick, white weatherboarding, clay tiles and Horsham slabs on the roofs of larger buildings and churches.
- Well managed village and farm ponds as focal points.
- Frequent wide views of the bold scarp of the Downs to the south and 'big skies'.
- Areas of tranquillity away from the main centres of settlement and roads.
- Distinctive pattern of north south orientated route ways and lanes which are considered to be drove roads along which farmers traditionally took their stock to the Downs. Typically these link with the steep bostals which climb the scarp slopes.
- Few main roads cross the area with the exception of the two north south A26 and A275 roads. The B2112 to the west of the area is a busy commuter route which puts pressure on the historic village of Ditchling. The B2116 running along the southern edge of the area under the north scarp of the South Downs is also a busy route. Rat running and fast traffic on minor roads which link these busy routes is intrusive.
- The mainline London to Lewes railway crosses the area.

Local Conservation Areas

- 4.17 As described previously the 'Old Cooksbridge' Conservation Area reaches out from Cooksbridge Farm along the road to the Cooksbridge itself, an original brick built structure of some age now obscured by overgrowth. The Conservation Area Plan defines under 'Key Views and Vistas' the views south from Cooksbridge Farm particularly characterised as being of an open and rural nature with noteworthy distant views of the South Downs.

'From the south of the conservation area, in particular Cooksbridge Farm, there are stunning views across the open landscape to the south, and the Cook's Bridge itself is set within much more open countryside.'

The Character of Cooksbridge village

- 4.18 The village as a rural settlement originated as a point cross the North End Stream and over the years has developed upwards and outwards from the wet unuseable land to the surrounding higher drier ground. Once the railway was brought through the village in the middle of the 19th Century it moved the focus of the village away the north part new 'Old Cooksbridge' and focused on what is in some places referred to as New Cooksbridge. The gap in middle of the two has always remained with the periodic flooding of the land in between.
- 4.19 The village and its surroundings, even with it's architectural mix of Victorian cottages and 60's 70's infilling, still bares many of the characteristics of the Low Weald, particularly at the periphery. Ancient field boundary are everywhere and as most of the land is low lying grazing land very few of these old hedges have been removed in the quest for bigger arable fields. And the village benefits from a mixture of private isolated aspects and occasional expansive views of great natural beauty.

4.20 It would seem the landscape of Cooksbridge could be defined as of: *Medium Quality*

4.21 That is its character is definable, shows many of the characteristics defined under the Local Character Area and National Character Area, if not necessarily as an exemplar of its type and does, as such, show scope and capacity for change if sensitively carried out.

Visual Impact Assessment: Baseline Conditions

4.22 The following are considered to be the main receptors to changes to the landscape:

- Employees travelling and working in the surrounding area.
- Pupils, staff and parents at the adjoining primary school.
- Pedestrian, cycle and horse riding users of the public rights of way surrounding the site.
- Tourists and locals using the landscape for recreation and leisure.

4.23 Road cyclists, private vehicle drivers and public transport users are transient receptors, focused on journeys and are therefore less sensitive to visual change.

Key Representative Views of Receptors of Development Proposals Identified

4.24 Viewpoint 1 - View from footpath immediately north west of the site

View looking east from public footpath from railway tunnel up to Cooksbridge Farm. Mostly viewed by occasional ramblers, local people and the farmer. The immediate foreground dominated grazing land falls away to a drainage ditch out of view and an established field boundary. The development site rises up in front and the grass of the field is visible above the level of the hedge where the land rises up in level. In the distance buildings on the junction of the A275 and the Hamsey Lane are visible as are established trees in the distance out towards Copyhold Farm.

Leylandii to the right of the view screens the timber yard (adjoining development site by others). The screen is in excess of approximately 10-15m tall is extremely visible throughout the surrounding landscape. An established native hedge crosses the mid ground mostly full to 1.5m high with occasional hedgerow trees which reach 3 or 4m in places. Other human influences include a telegraph poles and line leading diagonally into the distance across the site.

The view is almost completely open and the site is highly visible but the field boundary already forms some effective screening.

Distance of View – Close

Visual receptor type – A

Quality of view – Moderate

Susceptibility to change – Low

Value of view – Low

Sensitivity – Moderate

4.25 Viewpoint 2 - View from the railway line

The London to Lewes rail route runs along the South West boundary of the site. It's not practical to document this view but it is a wide view, very similar to View 1 but from an elevated position. The view will be most evident on the approach from Chilmington until the train reaches the timber yard when the view will begin to be screened or obscured by intervening buildings. After the train passes the level crossing it runs into a cutting and all views will be obscured. Whilst there will be some tourists using the train in daytime, the train only runs 5 days a week and it can be assumed that the majority of users will be commuters and local people.

Distance of View – Close

Visual receptor type – C

Quality of view – Moderate

Susceptibility to change – High

Value of view – Low

Sensitivity – Low

4.26 Viewpoint 3 - View from footpath at south west corner of Cooksbridge Farm

Occluded view looking south from public footpath by the corner of the Cooksbridge Farm property. The view will mostly be seen by walkers as View 1. The view significantly obscured by foreground hedgerows and intervening stands of trees. Most are self-seeded trees along the banks of North End Stream (the point where a lone pair of trees sit in the mid ground). The tops of the Leylandii hedge at the timber yard are visible through the branches, when the trees come back into leaf the site may be almost completely obscured. The large Sequoia trees at the top of New Cooksbridge are visible, as are a couple of rooftops of buildings along the high street. The scarp slope of the Downs rises up in the distance towards Offham and the National Park / SSSI. The site is surrounded by pockets of tree planting and the nearby views are afforded as brief glimpses. Other human influences in this view include the telegraph poles and lines across the mid ground and in the middle distance by the railway line appears some form of signals box and telecom mast.

Distance of View – Close

Visual receptor type – A

Quality of view – Moderate

Susceptibility to change – Low

Value of view – Medium

Sensitivity – Moderate

4.27 Viewpoint 4 - View from Cooksbridge Farm (A275)

As previously discussed under legislation and the baseline descriptions this view is identified in the Old Cooksbridge Conservation Plan Appraisal. (*refer to point 4.17*)

View south across Cow Field only with the Cromps obscured by woodland east of main road. Whilst a number of cyclists and pedestrians were observed, the majority of receptors would be drivers, locals and commuters. Some clearly are tourists but they would not appear to be in the majority. The foreground grass and scrub is largely unmanaged forming part of the farm yard where there is signs of waste dumping and planting of windbreak trees possibly birch.

The hedgerows in the middle distance are old, discontinuous and frequently engulfed in bramble, ivy and old man's beard, standing back from the road. Mature hedgerow trees frequently obscure the view along the length of the road, some off which are quite established deciduous species, probably ash, alder, and some sessile oak (variably 15-20m tall). The Leylandii hedge at the top of the field can clearly be seen. Only half of the development site is visible as the west field, 'The Cromps' is screened by dense woodlands. But where visible much of the grass field can be seen.

The village itself is not currently visible from this point as it is screened by the Leylandii hedge. In the distance behind that ridge the scarp slope of the Downs rises up and dominates the background.

The Hamsey Neighbourhood Plan proposes the implementation of a cycle route along the road but presently the road is mostly used by fairly fast flowing car traffic.

Distance of View – Close

Visual receptor type – C

Quality of view – Moderate

Susceptibility to change – High

Value of view – High

Sensitivity – Moderate

4.28 Viewpoint 5 - Tanner's Lagge (A275)

View south across North End Stream and Cow Field only with the Crops obscured by woodland east of main road. As with View 4 the photograph is taken from the pedestrian footpath beside A275 below Cooksbridge Farm, but is predominantly seen from the road. In the foreground partially visible but obscured by overgrowth is the original 'Cooks Bridge' from which the settlements name derives. As with View 4 this view is seen occasionally by cyclists and tourists but it is mainly seen by drivers, many locals but the majority likely commuters passing at speed on their way to Lewes and Brighton.

Views of buildings in the village start to show, particularly the white house on the corner of the Hamsey Lane junction. As one drives into the village the views up to the South Downs become less dominant and the foreground elements become more dominant such as the bridge, the fragments of native hedgerow, large mature trees, etc. and behind that foreground sits the marginal vegetation to the North End Stream, and the occasional native trees. Behind that the seasonally flooding Tanners Lagge and the North boundary of the development site which is approx. 1.5m tall and perhaps 75% in tact. When vegetation is back in leaf much screening will be offered. Once the road passes the bridge and particularly the hedgerow the view of the sight does become completely open.

Other human influences include the pump house building at the bottom of the hill and all the signage marking entrance to the village. As explained in View 4 glimpses of the new Timber Yard proposal will become increasingly evident.

Distance of View – Close

Visual receptor type – C

Quality of view – Moderate

Susceptibility to change – High

Value of view – High

Sensitivity – Moderate

4.29 Viewpoint 6 - Footpath from Rainbow Inn

View looking south from public footpath heading east from Rainbow Inn south of Conyboro School. The path is signposted from the road and connects through to Barcombe. Whilst this track is possibly used more by the landowners the receptor in this case is the leisure walker or local passing through. The site is largely obscured by the foreground topography and the field. The land here gently rolls providing occasional glimpses through to the site. The view is partially filtered by the occasional hedgerow tree or thicket which are predominantly deciduous tree and shrub species. The view focus's naturally on the ridge leading up to Black Cap in the National Park and is expansive. The Leylandii hedge is visible through the gap in the trees mid right of the image. The two large Sequoia trees at the top of New Cooksbridge are also visible in the middle distance to the left.

The village presents a thin partially visible sliver between the foreground and the background whose effect will be minimised in spring and summer when the vegetation comes back into leaf.

View – Close

Visual receptor type – A

Quality of view – Poor

Susceptibility to change – Medium

Value of view – Low

Sensitivity – Low

4.30 Viewpoint 7 - The Cromps from North End Stream

View south from Public footpath running north of North End Stream immediately north of site. The footpath is only used by ramblers and locals connecting with the Ouse Valley Way below Barcombe. The route is identified as part of a number local walking guides but it would be reasonable to assume this route is primarily used in summer, in autumn or winter a similar route is achieved by taking a diversion via dry ground through the Hamsey Lane or the footpath in View 6.

The footpath immediately adjacent to the site but the view is almost completely obscured by the vegetation and the hedgerow trees growing alongside the stream. There is one point where an access gate opens up the view across the stream and the site is fully visible but this would be a brief glimpses to the side of the ramblers main focus, along the path following the stream. All the vegetation is deciduous, dominated by Alder, Ash and Willow. In summer when everything is in leaf the field will be very much obscured. During the winter months the filtered view allows a lot of green field to be visible. In the distance the school's boundary trees, a melange of architectural styles and building heights are all visible.

Distance of View – Close

Visual receptor type – A

Quality of view – Poor

Susceptibility to change – Low

Value of view – Low

Sensitivity – Moderate

4.31 Viewpoint 8 - A275 and Hamsey Lane Junction across Cow Field

View from the parking layby on the A275 frequently used by those commuting from Cooksbridge station when the station car park is filled. From this point the full length of the boundary of Cow Field is visible as is a large proportion of the field as it rises up in the middle distance. Some scrub vegetation running along the top of the bank filters the view a little but barely. The Leylandii hedge just starts to the left of view. Whilst the road is sunken like the other drove roads locally but the effect is magnified by the probable road widening to accommodate the modern width. The road is busy with signage and traffic calming measures and a number of established trees in the opposite hedgerow provide some screening with the approx. 1.5m high species rich hedge of the east field, 'The Cromps'. In the distance the woodland at Old Cooksbridge, the farm and its windbreak of planted trees are all visible. The view is dominated by the road and its associated features.

Distance of View – Close

Visual receptor type – C

Quality of view – High

Susceptibility to change – Medium

Value of view – Low

Sensitivity – Low

4.32 Viewpoint 9 - View from Hamsey Lane across 'The Cromps'

View from Hamsey Lane from south side of the site looking east and down to North End Stream. A minor lane with poor visibility being surrounded by hedges and high verges whilst it may be used by walkers, cyclists, horse riders it is more likely used by locals driving to and from Barcombe or Hamsey. In the distance beyond the stream the topography rises up towards the woods and fields of the Conyboro estate. The A275 lying immediately to the west is well obscured from the site, physically by its lower elevation and by its well established hedgerow along the field boundary.

The hedge along the A275 is approx. 1.5m high, thick and gap free. As with the other historic field boundaries this hedge would suggest to being rich in native species. The southern boundary is completely open only bounded with post and wire fencing across the foreground. A number of telegraph poles are visible in the foreground. In the near distance the northern and western field boundaries are clearly visible. The boundary along the stream is porous in places but generally the boundaries are formed of well-established colonising native trees and scrub, such as Ash, Alder, and Field Maple.

There are no obstructions to this view.

Distance of View – Close

Visual receptor type – B

Quality of view – High

Susceptibility to change – Low

Value of view – Low

Sensitivity – Moderate

4.33 Viewpoint 10 - View from Horse Brook looking across the Cromps to the A275

View from Hamsey Lane standing opposite Cooksbridge School playing fields beside Horse Brook looking west across The Cromps to the A275 below. The road is identified in some local walking maps as a route to Hamsey, and is quiet, as no traffic was seen in the Hamsey Lane throughout the time spent at site. The receptors would be the same as view 9.

To the left the view is enclosed by shrub vegetation, and an established native hedge approx. 1.5m in height, full and continuous to the end of the lane. To the right the view is framed by the beginnings of the colonising vegetation to the drainage ditch. Beyond, the extensive grass rolls out to the distant field boundary along the A275. At the bottom of the field the pump house is visible and one of the buildings of Cooksbridge Farm. Beyond the view is mostly enclosed by stands of deciduous trees in the fields below Cooksbridge Farm.

Distance of View – Close

Visual receptor type – B

Quality of view – Moderate

Susceptibility to change – Medium

Value of view – Low

Sensitivity – Low

4.34 Viewpoint 11 - View from Hamsey Lane at Copyhold Farm with roofs of urban development around station visible

View looking west to the site, typically obscured by topography, hedgerows and high hedge banks to lanes. View looking west from junction of two public footpaths and the Hamsey Lane where by the 'Greenwich Meridian' sign nearby Copyhold Farm. Receptors the same as at View 9. Less than 1km away and with a vantage point of higher elevation the site is still completely obscured. The view seems to be exemplary of Low Weald character, with mixed grazing and arable land very clearly defined by established hedgerow field boundaries, sporadic mature trees and frequently sunken roads suggesting significant age to the route. Views are afforded by significantly higher ground frequently looking out and up but largely obscured in the near distance.

There is no view of the site.

Distance of View – Close

Visual receptor type – B

Quality of view – Poor

Susceptibility to change – High

Value of view – Low

Sensitivity – Low

4.35 Viewpoint 12 - View from gate on Beechwood Lane

View from the gate into Beechwood Hall recreation ground. This site is clearly well used by local children and adults alike for recreation and is the only truly communal access open space in the village. It is a functional space which whilst having a pleasant rural aspect is not significantly rare. From this viewpoint the development site is completely obscured by the timber yard and the Leylandii hedge.

No view of the site.

Distance of View – Close

Visual receptor type – B

Quality of view – Poor

Susceptibility to change – High

Value of view – Low

Sensitivity – Low

4.36 Viewpoint 13 - View from footpath north of Winterland Farm

View south from footpath connecting from Wickham Lane through to A275 Resting Oak Hill. This public right of way is relatively trodden but is probably still ploughed with the rest of the field judging from the soft going. Whilst certainly attractive, and very characteristic of Low Weald, it is a common view in the area looking across a patchwork of open grazing and arable fields broken up with aging native hedgerow boundaries, past the village in the dip below, towards the South Downs scarp slope and ridge running through to Offham and Lewes on the far side. Farm buildings sit further down the hill and to the left would be mostly obscured when the vegetation is in leaf. The very tops of the Leylandii hedge are visible in the middle distance but as only the tips of a 10-15m hedge it would seem that the site is mostly obscured by the topography in the middle distance.

Distance of View – Medium

Visual receptor type – A

Quality of view – Poor

Susceptibility to change – Medium

Value of view – Low

Sensitivity – Low

4.37 Viewpoint 14 - Footpath below Blackcap

View north from footpath to Blackcap. Close by View identified in 'South Downs National Park: View Characterisation and Analysis' Published November 2015 by LUC and SDNPA and in several other documents. The view is regarded by many as to be of high quality. But at this distance of 2-2.5km away the site and at an elevation of 125m AOD it is extremely difficult to discern the development site. As ramblers or horseriders descend the path the view of the site will become increasingly acute. The timber yard and the Leylandii hedge are discernible from this vantage point but the great distance makes the site a minor element of the view. Chimney pots and roof apexes may be visible of the first row of houses on the edge of the village but the site will be barely discernible and mostly obscured by the timber yard. At this distance even the two veteran Giant Sequoia's (25-30m) at the top of the village seem insignificant. The view is dominated at this point by the form of the shaw cut in between to spurs jutting out from the downs either side and the sweep of the road to Ditchling snaking up the hill. The patchwork of the Low Weald unravels out to meet the High Weald clearly visible in the distance. The Lewes Down SSSI and SAC site is also visible to the right of the horizon.

Distance of View – Long

Visual receptor type – A

Quality of view – Poor

Susceptibility to change – Medium

Value of view – High

Sensitivity – High

5.0 IDENTIFICATION AND EVALUATION OF POTENTIAL EFFECTS ON LANDSCAPE AND VIEWS

6.0 SUMMARY

COOKSBRIDGE

Iceni Pre-Application Document
27 June 2017



CONTENTS

- 1. INTRODUCTION
- 2. SITE LOCATION
- 3. SITE PHOTOS
- 4. LOCAL ANALYSIS
- 5. SITE ANALYSIS
- 6. DESIGN RATIONALE
- 7. THE MASTERPLAN IN COOKSBRIDGE
- 8. ILLUSTRATIVE MASTERPLAN
- 9. ILLUSTRATIVE VIEWS

1 Introduction

This document has been prepared on behalf of the Estate and Agency Group to accompany a request for pre-application advice to develop a site in Cooksbridge, for in the region of 154 residential dwellings, mixed use centre and associated parking and landscaping.

The document outlines the context to the site, presents the site constraints and work towards a masterplan solution.

2 Site Location

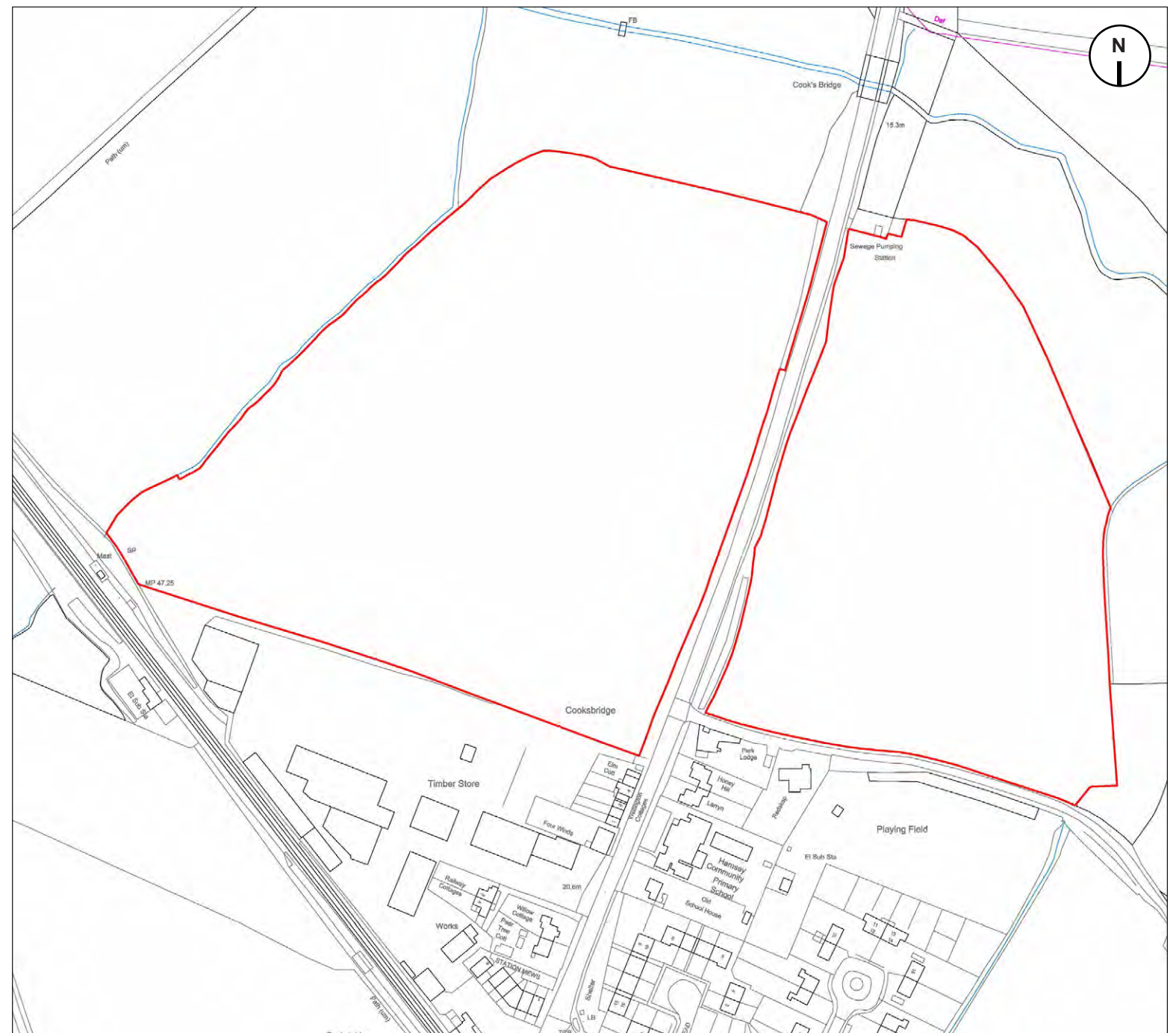
The site sits to the immediate north of the settlement of Cooksbridge and the South Downs National Park, in the parish of Hamsey, East Sussex. It incorporates land to the east and west of the A275. The site forms part of the northern boundary of Cooksbridge and extends to approximately 9 hectares, consisting of arable land sloping to the north.

The A275 dissects the sites into two parts and acts as the boundary between them. Along the southern boundary of the western area is an area of industrial buildings and open storage areas associated with the timber and builders yard, separated by tree planting. It should be noted that outline planning permission has been granted for an area of the open storage for up to 25 dwellings (Application no. LW/14/0943).

Hamsey Lane forms the southern boundary of the eastern site, with a stream and landscaping marking its eastern boundary. A sewage pumping station is located adjacent to the eastern site's northern boundary, close to the A275.

The site as a whole is currently in agricultural use with no buildings on site.

Key
 Site boundary



Application boundary (not to scale)

3 Site Photos

- 1. Looking south west across the western site boundary towards the timber yard.
- 2. View south opposite entrance to residential property on A275.
- 3. View south from opposite entrance to Cooksbridge Farm.
- 4. View north from A275 towards Cooksbridge Farm.
- 5. View north along the A275 showing existing landscaped edge.
- 6. View of the southern tip of the site from Cooksbridge village.
- 7. View south from A275 with the western site in the background.
- 8. View of the house on the corner of Hamsey lane and the A275.
- 9. View towards Cooksbridge village showing informal on-street parking along the verge.



Photograph locations



4 Local Analysis

The site is located close to Cooksbridge station, which provides links to Gatwick Airport and London Victoria in an hour. Road links provide connections to the wider South Downs National Park, as well as the local centre of Lewes.

Bus routes serve the settlement and provide services to Lewes, Uckfield and Barcombe.

A comprehensive public footpath network links the settlement and site to the wider countryside.

The amenities in Cooksbridge, as well as the railway station, include the Hamsey Community Primary School, the recreation ground and community centre at Beechwood Lane.



Local Analysis Plan

5 Site Analysis

Site constraints

The site's constraints can be summarised in the following categories. These have been identified as part of a comprehensive survey of the site, which feeds into a constraints plan, an extract of which is included.

Contours

The site slopes downwards from north to south, towards the lowest lying land outside of the site. These areas (which have been included in the survey and shown on the Constraints Plan) are densely planted, and include areas known locally as lagoons.

Overhead cables

Overhead cables run over the northern part of the west site, cross the A275 and cut across the northern and eastern parts of the eastern site towards the settlement of Cooksbridge.

Sewer Network & Utilities

An existing sewer runs parallel to the A275 inside the western site and runs along the sites southern boundary. A separate sewer takes a similar route but runs along the southern boundary of the eastern site. A water supply runs along the western site's southern boundary, to cross the A275 and continue to the north of Hamsey Lane.

TPOs

A number of protected trees exist along the site's southern boundary with the timber store.

Boundary Treatment

The western site is bounded on all sides by hedgerows and trees, whilst the eastern site is marshland to the north and Hamsey Lane to the south.

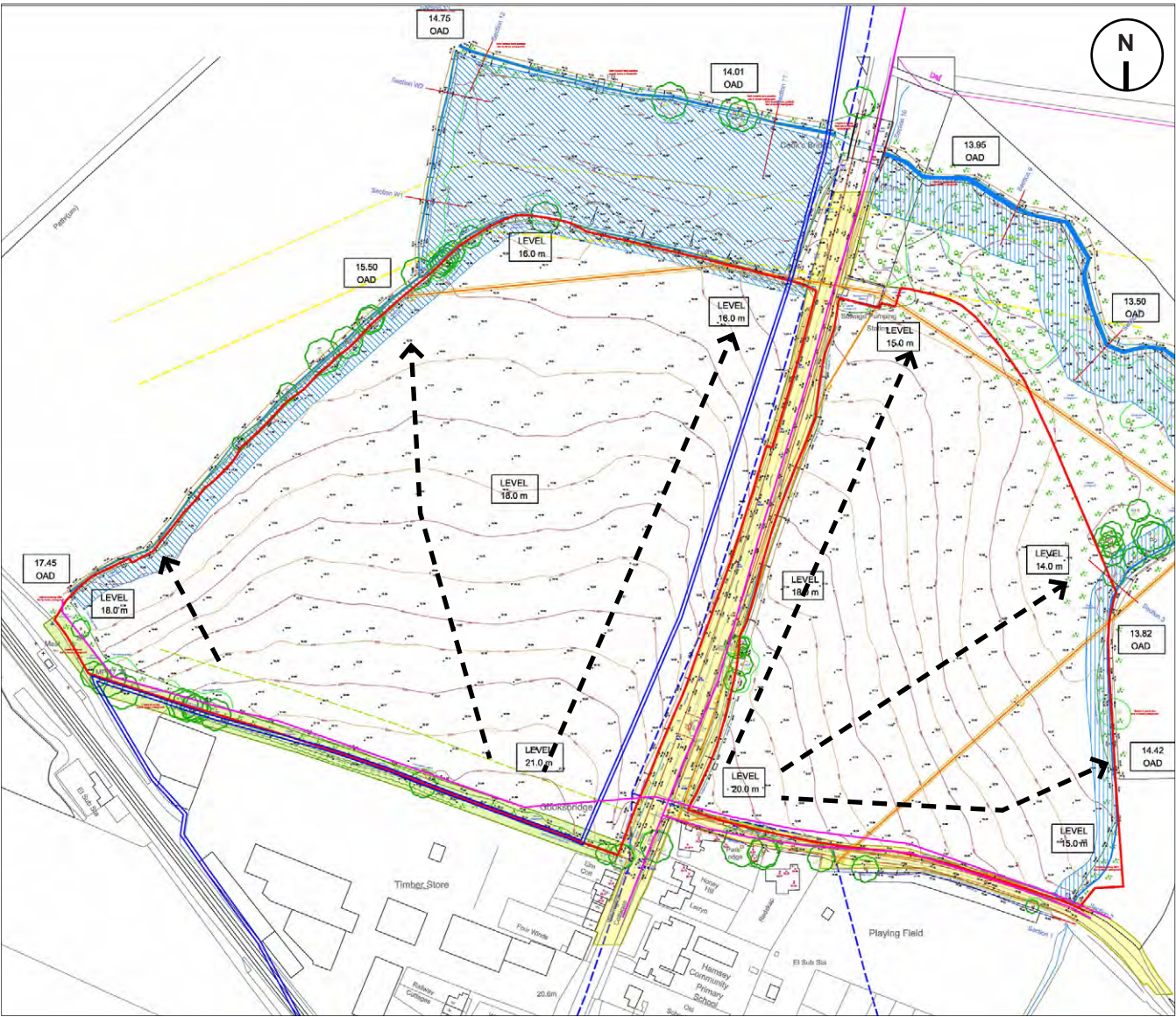
Pumping Station

A pumping station is located adjacent to the A275 and the site's northern boundary, on the eastern side of the road.

The proposed scheme will work with the constraints of the site to produce a responsive layout and design solution.

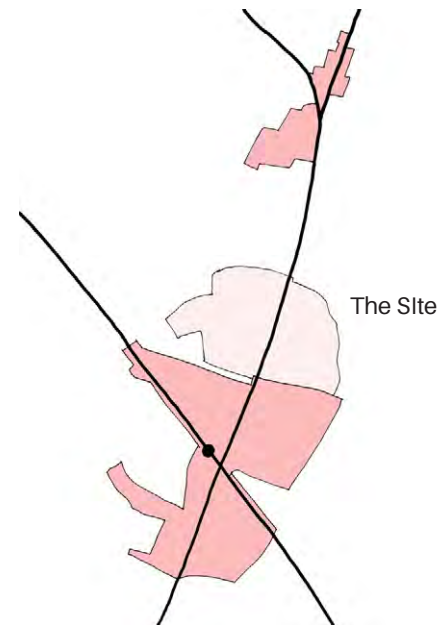
Key

- Site Boundary
- Overhead Electric Cables
- Water Supply Network
- Spot Heights
- Landfall
- Sewerage network 1
- Sewerage network 2
- Existing Trees
- TPO's
- Highway Adoption Area
- Surface Water Runoff area



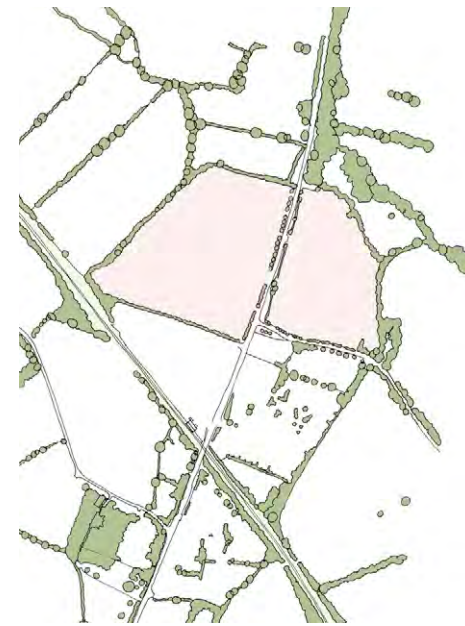
Constraints Plan Extract (not to scale)

6 Design Rationale



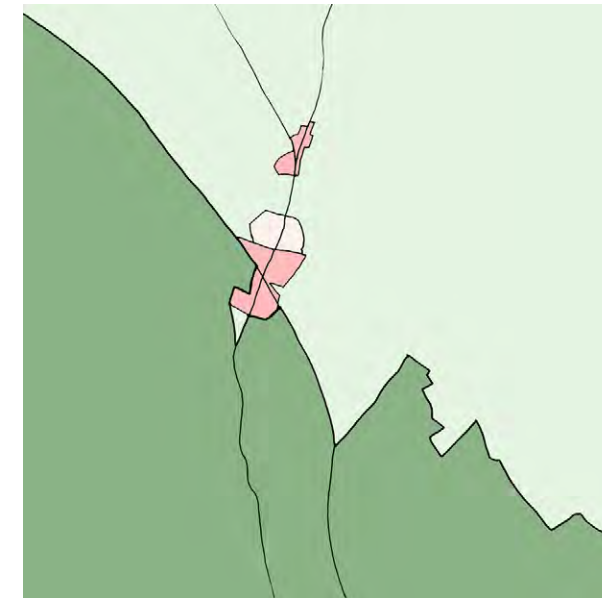
Respecting the setting of Cooksbridge

Create a sensitively laid out neighbourhood that is respectful to the setting of Cooksbridge



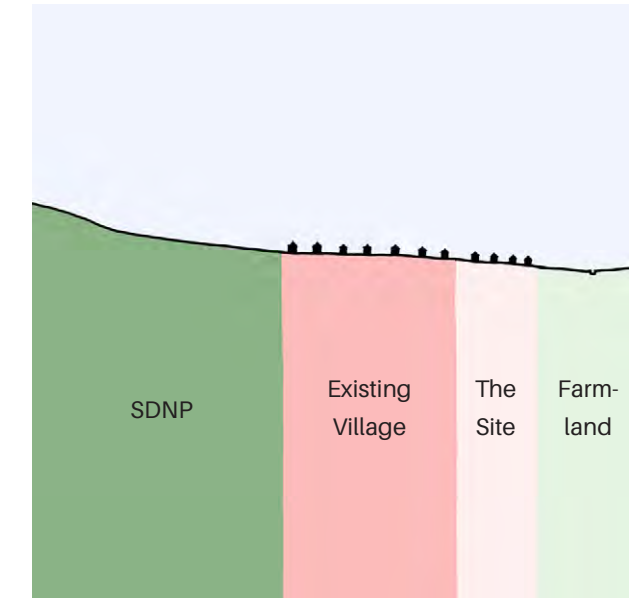
Fitting in to the existing landscape structure

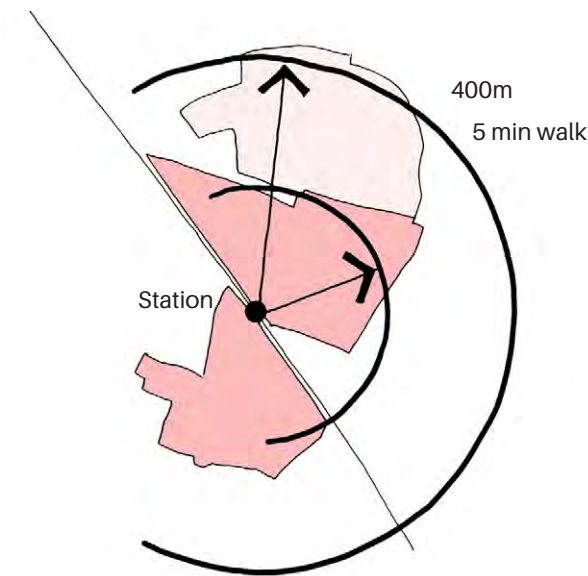
Provide an area of new housing the fits into the landscape structure of the village including its hedgerows, woodland, street planting and watercourses.



Respectful of the South Downs National Park (SDNP)

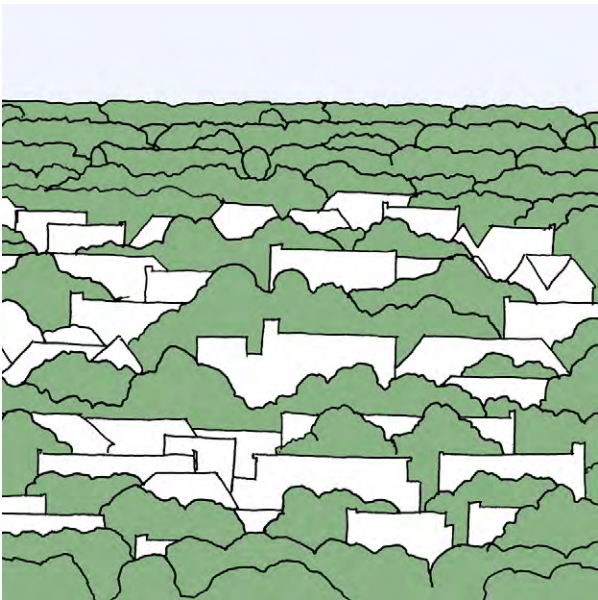
Locate the area of new housing on the opposite side of the village to the South Downs National Park. Located in such way that the existing village acts as a buffer between the site and the National Park as it forms rising land to the south.





Creating a well connected neighbourhood

Provide a new neighbourhood in close proximity to Cooksbridge railway station, allowing more people with sustainable access to Lewis and London.



Low Visual impact

Layout an arrangement of houses with a low visual impact, ensuring that the setting out of buildings responds to the levels and contours of the site. Low visual impact will also be aided by the vast majority of new homes to be two storey.



Creating a new mixed use centre

Includes a shop (with flats above) around a square; to provide the village with the much needed amenity and to strengthen the identity of the village. It also includes a school drop-off area; that will provide safer drop off facilities for the Hamsey Community Primary school (HCPS) children.

7 The Masterplan in Cooksbridge



Cooksbridge over brook

Recently approved housing

Cooksbridge Station



8 Illustrative Masterplan

The adjacent plan provides an indicative overview of the proposed masterplan. This plan should not be considered as a reflection of the final masterplan solution, but to allow feedback and a visualisation of how the site layout could look.

Key components of the masterplan include:

- Changing the character of the A275 from a road to a street, through planting and new frontages.
- Providing a new entrance to the existing settlement of Cooksbridge
- Enhancing the identity of the village to form a new village square; a focus for the new and existing community. The new hub will include a shop and provision for drop-off facilities for Hamsey Community Primary School.
- Realigning Hamsey Lane at the junction of Hamsey lane and the A275, to provide legible and clear movement routes around the new village square.
- A network of open spaces that work with the topography of the site contributing to a comprehensive drainage strategy.
- Set housing in the existing landscape structure of Cooksbridge and include the provision of new planting to enhance the network.

The illustrative masterplan is followed by two key perspective views of the proposals.



9 Illustrative Views







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Da Vinci House
44 Saffron House
London EC1N 8FH
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

Planning Services
Lewes District Council
Southover House
Lewes
BN7 1AB

5th November 2018

Dear Sir/Madam,

Representations to Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD pre-submission (Regulation 19) Consultation | Land at Old Hamsey Brickworks Lakeside, South Chailey, Lewes, BN8 4QD

On behalf of our client, EA Strategic Land LLP ('EASL'), we write in response to Lewes District Council's Local Plan Part 2 Site Allocations and Development Management Policies pre-submission (Regulation 19) document (consultation document) to promote the land at the above address (The Site) outlined in red on the enclosed site location plan (drawing reference: OHB_750_005).

EASL has a long-standing interest in this site and the wider land holding, having gained outline planning permission for the redevelopment of the Former Old Hamsey Brickworks Site, which adjoins the lakeside, with 8 x B1 (business) unit and enabling residential development of 37 open market houses and 12 affordable dwellings (LPA ref: LW/14/0712).

In addition to this, EASL have also obtained outline planning permission for the redevelopment of the neighbouring Knights Court for a further 6 dwellings (LPA ref: LW/17/0030).

Reserved Matters Applications in respect of the above planning consents were submitted to Lewes District Council in October 2018.

These representations focus on the matters of housing need and delivery; the sustainability, suitability and achievability of the lakeside parcel of the Old Hamsey Brickworks site for residential use. These representations provide commentary relating to the overall soundness of the consultation document and the proposed allocation of housing in contrast to the identified need.

a. Lewes District Council Housing Need and Delivery

The Housing Policy Context set out within the 'Consultation Document' explains that Spatial Policies 1 of the adopted Local Plan Part 1 (2016) identifies the housing requirement for Lewes District as being 6,900 net additional dwellings (345 dwellings per annum). This relates both to the plan area and part of the District falling within the National Park.

Strategic Policy 2 demonstrating that 6,926 net dwellings can be provided over the course of the Plan period and treats this in effect as the requirement for the district as a whole. The Council also seeks to suggest that of the 6,926 homes figure, the proportion of housing to be delivered outside the National Park is 5,494 net additional dwellings over the Plan period, amounting to a housing requirement of 275 dwellings per annum, with the remaining 1,432 dwellings (72 dpa) being provided within the South Downs National Park.

The Consultation document identifies that of the Part 1 Plan housing requirement of 5,494 dwellings, the supply as at April 2015 was as follows:

- 2,216 dwellings – Built or committed as at 1 April 2015;

- 1,073 dwellings – Housing supply from strategic allocations;
- 468 dwellings – Supply from windfall allowance; and
- 77 dwellings – Supply from rural exception sites allowance.

The above equates to a total of 3,834 dwellings.

This leaves 1,660 dwellings to be allocated in the emerging Stage 2 Local Plan. The consultation document explains that this will be accounted for by 1,250 dwellings through adopted or emerging Neighbourhood Plans and the remaining 432 dwellings as residual housing growth which is to be identified within the Local Plan Part 2. Of this number, some need to be met within specific settlements as per Policy SP2, whilst the location of 200 dwellings are still yet to be determined.

The requirements of the National Planning Policy Framework

It is acknowledged that, the Regulation 19 Consultation document has been prepared under the National Planning Policy Framework (NPPF) (2012), which sets out the overriding principle to achieve “sustainable development.”

When examining the soundness of a Local Plan the NPPF (2012) explains under paragraph 182 that Plans must be:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be based on the most appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

This is a requirement that has been carried forward under Paragraph 35 of the adopted NPPF (2018).

Although it is appreciated, under Paragraph 214 of the NPPF (2018), that ‘the policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019’ should the Independent Inspector, find the submitted Local Plan Part 2 document to be unsound then, given the amount of dwellings which are found to be required under the draft standardised housing methodology, it is likely that Lewes District Council will be required to allocate even more suitable and sustainable land for residential purposes, in order to deliver their increased OAN.

Given that by their own admission, Lewes District Council accept that they are unable to demonstrate a five-year housing land supply against the Council’s Objectively Assessed Housing Need, the consultation document, when viewed against the requirements of the NPPF, should be seen as unsound. It is therefore imperative that in order to fulfil their requirements, Lewes District Council revisit the ‘Residential Site Allocations’ and Housing Policy Context chapters of the draft Local Plan Part 2 document and seek further opportunities to allocate more suitable, sustainable, available and achievable sites for residential purposes.

b. Housing Land Supply

Iceni accepts that the purpose of the Part 2 plan is to meet the housing requirement set out in the Part 1 plan. It is not to re-examine the housing requirement.

However we would comment that the Part 1 housing requirement is a **minimum figure** and thus where there are sustainable sites that can be allocated, they should be. This is particularly relevant given that the Part 1 did not meet Lewes District's OAN – the plan requirement of 345 dpa falling substantively short of the OAN of 520 dpa (see Inspector's Report Para 22). In this context it is clear that every effort should be made to identify and bring forward additional sustainable sites.

In respect of the land supply put forward within the Plan, Iceni notes the following:

1. Windfalls

Windfall sites, by definition, refer to sites which become available for development unexpectedly and therefore not included as allocations within the Council's development plan nor an adopted neighbourhood plan. We accept that the windfall numbers and the rural exception site allowance have been tested and accepted in the Part 1 Plan Examination.

2. Requirement and Supply

The Council has calculated the level of provision to be made in the Part 2 plan by taking the requirement, and totalling the supply expected to come forward from completions/commitments, strategic allocations, the made neighbourhood plans and emerging neighbourhood plans. This results in a figure of 127 dwellings (Table 4). Set against this, the plan proposes the allocation of 132 dwellings.

The position taken provides no flexibility in supply. It is typical for local plans to make provision for sites above the requirement figure, to take account of delays in some sites coming forwards or non-implementation. The approach adopted provides no provision for this flexibility. No contingency is allowed for in the event that the delivery of some sites is delayed, or the emerging neighbourhood plans fail to make provision for 865 dwellings which in itself is a significant assumption. In this respect, the plan is not effective.

Iceni note that the 'Lewes District Five Year Housing Land Supply Position as at 1 April 2018' confirms that "the District as a whole has a supply of deliverable housing land equivalent to 4.99 years outside of the South Downs National Park (calculated via the Liverpool Method), and therefore unable to demonstrate a five year housing land supply; and a supply of deliverable housing land equivalent to 4.92 years inside the South Downs National Park Area. This highlights the need to bring forward additional housing supply to provide sufficient to deliver the level of housing needed, and points to an under-delivery against the constrained requirement.

This requirement is intensified, given that sites such as the proposed development at Marina Fort Road, Newhaven have been allocated since 2003 with still no sign of development coming forward and current marketing material anticipating that development on the site is not likely within the next five years. The five-year land supply should be reviewed, and additional sustainable sites brought forwards.

Lewes District is evidently facing challenges to meet their housing requirements and deliver their OAN within the defined settlement boundaries. These challenges are intensified by physical barriers with the District being constrained to both the south and north, by both the sea, and the South Downs National Park, respectively. To help relieve some of this pressure EASL believe that development on the eastern edge of the lake at Old Hamsey Brickworks would benefit the Lewes Housing Market as it provides sustainable opportunities to deliver additional housing to go towards the Council's housing shortfall against its OAN and to provide the required flexibility of supply to deliver the Part 1 Plan requirement. The site has the ability to deliver up to 12 serviced plot self/custom build dwellings allocated with the emerging Local Part 2 document.

c. Proposed Development of land at land at Old Hamsey Brickworks, Lakeside

The land at this location extends to cover approximately 7ha and consists of the land to the north of the area granted outline planning permission on 17th November 2015 at the former Old Hamsey Brickwork site (LPA application reference: LW/14/0712). The proposed development site consists of the land to the east edge of the lake and sites outside of the Kiln Wood and Ancient Woodland and related buffer zone to the east.

The wider Old Hamsey Brickwork site comprises an irregular shape extending to 9.41 hectares in total, sitting to the east of the A275, South of South Chailey and north of Cooksbridge. The site falls beyond any of the defined built up areas as identified in the 'Saved' Lewes District Local Plan 2003. For Planning Policy purposes, Lewes District Council therefore define the site as being located in the open countryside.

Despite this, the NPPF stipulates that in rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local need. In order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. The NPPF also supports well designed new buildings to support sustainable growth and expansion of all types of enterprise in rural areas.

It is also key to note that the proposed development site falls within the NPPF definition of previously developed land (PDL). This is evident as no application has been submitted to restore the lake and the surrounding land from its former landfill purpose. For reference, the NPPF defines PDL as follows: "Land that has been developed for minerals extraction of waste disposal by landfill purposes where the provision for restoration has been made through development control procedures."

Given that an application has not been submitted to restore the lake and the surrounding land from its former landfill purpose, EASL are of the opinion that the site surrounding the lake should be seen as previously developed, development and the effective use of which is encouraged within the NPPF. Environmental Surveys have confirmed that the lake is not of high environmental value.

Given that the lake and the land surrounding the lake should be considered as previously developed land and that, by their own admission, Lewes District Council through the consultation document, are unable to provide sufficient land to meet their required OAN. It is proposed that this site, which adjoins and forms the same land holding as the Former Old Hamsey Brickworks and Knights Court site, both of which have been granted planning permission for residential use, should be seen as a suitable and sustainable location to provide additional dwellings to go towards the Council's required housing need.

In line with Core Policy 2 of the Joint Core Strategy 2010-2030, it is proposed that the site is suitable to deliver up to 12 service plot self/custom-build properties which will sit on the eastern back of the lake and would have the woodland as a backdrop. Access to the woodland will be informal and in accordance with the guiding principles set out within the woodland management plan. Improved access to this area will also encourage and create a new natural habitat for wildlife and species.

The proposal will also be of high-quality design which will respect the distinctive character and quality of the surrounding countryside in line with Policy DM1 of the emerging Local Plan Part 2.

This form of residential development represents a unique sector of housing need which Council's must deliver in line with the serviced plot Self-Build and Custom Housebuilding Act 2015, which places a duty on Local Authorities to keep a register of individual and association individuals who are seeking to acquire serviced plots of land in order to build homes for those people to occupy as their main/sole residence.

The Council have a requirement to meet this demand for self/custom build housing. With this in mind, the number of people who have registered an interest on the self-build demand list is 133. To date, Lewes District Council have confirmed that they have received 43 applications for self/custom build units since 1 April 2016. All the applications submitted have been approved, however, due to failure to comply with the CIL regulations (in most cases failure to submit a commencement notice prior to work commencing on site) only 33 permissions are still valid. This therefore leaves a remaining demand of 100 self/custom build units for the Council to deliver across the District.

d. Conclusion

Having reviewed Lewes District Council's Local Plan Part 2 Site Allocations and Development Management Policies pre-submission (Regulation 19) document, EA Strategic Land are of the opinion that the Plan is currently unsound as there is insufficient flexibility in the overall housing supply, that the plan has not been positively prepared in seeking to find additional sustainable sites consistent with the treatment of the housing requirement as a minimum, and the evidence does not suggest that the Council currently have a five year housing land supply.

Given the above, it is therefore imperative that, in order to fulfil their requirements, Lewes District Council revisit the 'Residential Site Allocations' and Housing Policy Context chapters of the draft Local Plan Part 2 document and seek further opportunities to allocate more suitable, sustainable, available and achievable sites for residential purposes.

EASL believe that the land to the eastern edge of the lake and sites outside of the Kiln Wood and Ancient Woodland and related buffer zone to the east provides an ideal opportunity to deliver up to 12 new serviced plot self/custom-build dwellings to be delivered towards the Council's required housing need target. This is as:

- The Site should be considered as Previously Developed Land which the development and effective use of is encouraged by the NPPF;
- The site has been considered suitable and sustainable for residential development as outlined by the planning permission for the combined total of 55 dwellings and 8 B1 business units on the surrounding Former Old Hamsey Brickworks and Knight Courts site (LPA ref: LW/14/0712 and LPA ref LW/17/0030 respectively);
- No objections have previously been received by statutory consultees to the principle of residential development in these locations. The proposal will also be of high-quality design which will respect the distinctive character and quality of the surrounding countryside in line with Policy DM1 of the emerging Local Plan Part 2.
- Development of the site will help the Council to deliver their requirement for providing serviced plot self/custom build dwellings; and
- The site will provide informal access to the woodland and be in accordance with the guiding principles set out within the woodland management plan. Improved access to this area will also encourage and create a new natural habitat for wildlife and species.

EASL respectfully request that Lewes District Council revisit the Residential Site Allocations section of the Regulation 19 Local Plan Part 2 document and consider the land at Old Hamsey Brickwork, Lakeside for residential allocation.

We trust that the above comments can be incorporated as part of the Council's Draft Local Plan Part 2 consultation exercise and we would be grateful for confirmation that these representations have been received. EA Strategic Land also confirm that they would like to be involved in future stages of the plan-making process and request attendance at future EIP sessions. We trust that the information provided is sufficient at this stage, however, should any additional information be required then please do not hesitate to contact me on 02034354227/ lscarfe@iceniprojects.com.

Yours Faithfully,



Leo Scarfe MRTPI

Senior Planner

Key

 Future lakeside development area

A 23.04.18 First Issue.

Rev Date & Description


Unit 7, Sowells Farm
Surrey Road
BN9 5PH
T 01273 400004
F 01273 400005
E info@rawarchitecture.co.uk

Project
Old Hamsey Brickworks
East Sussex

Drawing
Lakeside Housing Zone Plan

Job	Drawing	Revision
OHB	750/005	.

Size	Date
A1	23.04.18

Status
Draft for Comment

Representation ID: REP/367/OMRepresentor Details:

Representor ID:	REP/367
Name:	Rachel Richardson
Organisation:	Thakeham Homes Ltd
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	rachel.richardson@thakeham.com
Address:	Thakeham House Summers Place, Stane Street Billingshurst West Sussex RH14 9GN

Representation:

Policy/Section:	Housing Policy Context: Omission Site Former Woods Fruit Farm, Newick
<i>Do you consider the document to be:</i> Legally Compliant: Sound:	
Representation: (SEE PDF FOR FULL REPRESENTATION)	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?



THAKEHAM

Planning Policy (Local Plan Consultation)
Lewes District Council
Southover House
Southover Road
Lewes
BN7 1AB

5th November 2018

Dear Sir/Madam

Lewes District Local Plan Part 2: Site Allocations and Development Management Policies DPD - Pre-Submission version

Re: Former Woods Fruit Farm, Newick

Introduction

Thakeham Homes Ltd are submitting representations to the Lewes Local Plan Part 2: Site Allocations and Development Management Policies ('LPP2') as local stakeholders. Thakeham are a house builder based in Sussex with a track record for delivering high quality, sustainable scheme across the South East. We are progressing a number of potential development sites within this district at varying stages of the planning process, therefore our representations relate to the role of the emerging Local Plan in the delivery of the District's adopted housing objectives over the plan period.

We have previously made representations on Local Plan Part 1 and most recently on Local Plan Part 2: Site Allocations and Development Management policies (Regulation 18) dated 24th January 2018. We therefore have a long-standing interest in the Local Plan preparation which we support.

Local Plan Part 2 must have due regard to the primary document which is Local Plan Part 1, given it forms a strategic level plan for the whole district. We have concerns that this has not occurred.

These representations are submitted in respect of Thakeham Homes' interests at the Former Woods Fruit Farm, Newick ('the site'). The site is also known by SHELAA (2018) reference 27NW, with 22NW also forming part of the site which has the benefit of a Neighbourhood Plan allocation (Policy HO4) in the 'Made' Newick Neighbourhood Plan, for 38 net additional residential dwellings. A red line location plan for the site is appended to this representation at Appendix 1.

We confirm within these representations that this site is available and deliverable within the next five years and is set within a highly sustainable location. As such we wish to make representations on the policies contained within the Draft LPP2.

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We wish to support the progression of the LPP2 and make comments within our representations on the basis that the site allocations document should be prepared to ensure conformity with the spatial requirements of the adopted Lewes Core Strategy: Local Plan Part 2 ('LPP1') and further site allocations should be sought to ensure that the requirements of the National Planning Policy Framework (NPPF) are met.

NPPF, paragraphs 10 and 11 set out the presumption in favour of sustainable development (Section 2),

Paragraph 11(a) identifies a requirement for Local Planning Authorities '*to positively seek opportunities to meet the development needs of their area*'. Whilst Paragraph 119 states that "*Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs*".

Para 120 states that Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability."

We also wish to make representations to the proposed changes to the planning boundaries and the proposed 'Provision of Outdoor Playing Space' and 'Children's Play Space in New Housing Development' policy. As such, these representations also respond to Policy DM1, DM15 and DM16 of the Draft LPP2.

Spatial Distribution

Table 3 (Residential site allocations) of the Draft LPP2 provides an indication of the planned level of housing in the District, outside of the National Park:

Table 3 Planned level of housing, outside the National Park

Settlement	SP2 Planned housing growth	Neighbourhood Plan housing (adopted and emerging)	Residual housing growth to be identified in LPP2
Newhaven	425	425	-
Peacehaven & Teiscombe	255	255	-
Seaford	185	185	-
Edge of Burgess Hill (within Wivelsfield Parish)	100	0	100
Barcombe Cross	30	0	30
North Chailey	30	0	30
South Chailey	10	0	10
Cooksbridge	30	0	30
Newick	100	100	-
Plumpton Green	50	50	-
Ringmer & Broyle Side	215	185	30
Wivelsfield Green	30	30	-
To be determined	200	-	200
Total	1,660	1,250	432

KEY	
 	Housing growth to be delivered through neighbourhood plans
 	Housing growth identified in 'made' neighbourhood plans
 	Housing growth identified in Local Plan Part 2

Table 3 which provides residual housing growth to be identified in LPP2, which in the case of Newick is 0. As stated in our earlier representation in January 2018, this is unacceptably low as these figures represent a minimum and all appropriate sites should be assumed to come forwards.

Whilst Spatial Policy 2 of the adopted LPP1 makes clear that all planned housing growth numbers are stipulated as minimums, and the LPP2 does state at paragraph 2.7 that *'It should be borne in mind that the figures contained within the Spatial Policy 2 are expressed as minimums and where appropriate growth should exceed this minimum figure'*, in our view the above table does not address these figures as minimum requirements.

This is because it is clear at Table 2 that most parishes have not sought to exceed their minimum requirements within adopted and emerging Neighbourhood Plans. The Council has not sought to allocate sites within the LPP2 over and above the housing growth identified within these adopted and emerging Neighbourhood Plans, thus only meeting the minimum requirement for most settlements. In our view, this falls short of the requirements of the NPPF as the Plan has not been positively prepared to meet the District's development needs. Additionally, and with particular relevance to Thakeham Homes' interests at the Former Woods Fruit Farm, Newick, the Newick Neighbourhood Plan was adopted prior to the Core Strategy (LPP1). Therefore, as the latest development plan adopted, we would continue to maintain that the Core Strategy requirements should take precedent.

This is particularly since Regulation 18 stage of LPP2, there has been the publication of the revised NPPF (July 2018) which provides additional weight to promoting house building and in maintaining a sufficient supply and delivery of homes. Specifically, Paragraph 59 states:-

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay".

Paragraph 16 (a and b) of the NPPF states that Local Plans should "be prepared with the objective of contributing to the achievement of sustainable development and be prepared positively, in a way that is aspirational but deliverable", whilst Paragraph 11(a) makes clear that Local Plans should ensure flexibility to adapt to rapid change. The LPP2 has identified at Table 5 that most parishes have not sought to exceed their minimum requirements within adopted and emerging Neighbourhood Plans. The Council has not sought to allocate sites within the LPP2 over and above the housing growth identified within these adopted and emerging Neighbourhood Plans, thus only meeting the minimum requirement for most settlements. In our view, this falls short of the requirements of the NPPF as the plan has not been positively prepared to meet the district's development needs. Additionally, some Neighbourhood Plans, such as the Ringmer Neighbourhood Plan were adopted prior to the Core Strategy. Therefore, as the latest development plan adopted, the Core Strategy requirements should take precedent.

Table 3 shows that Newick does not have a residual requirement from the minimum requirements set out in Policy S2 of the LPP1. However as all the requirements are minimums it could be questioned as to why the council are not seeking more sites or pursuing

opportunities where more sites are available for development. A brief explanation is provided at paragraph 2.6:

'Housing growth at Newick, Plumpton Green, Ringmer and Wivelsfield Green is planning for through their respective 'made' neighbourhood plans (shaded yellow). Neighbourhood Plans are currently progressing and will identify the housing growth for the following settlements (shaded blue):

- *Peacehaven and Telscombe;*
- *Newhaven; and*
- *Seaford.*

Local Plan Part 2 is therefore required to identify the planned housing growth at the remaining settlements of Edge of Burgess Hill (within Wivelsfield Parish), North Chailey, South Chailey, Barcombe Cross and Cooksbridge.'

Whilst paragraphs 2.114 – 2.115 state:

2.114 Spatial Policy 2 of the Local Plan Part 1 sets the requirements for a minimum of 100 net additional dwellings to be provided within the settlement of Newick.

2.115 Newick Parish Council has a 'made' Neighbourhood Plan, adopted July 2015, that allocates sites for 100 net additional dwellings. One allocated site, Newick Hill identified for 30 net additional dwellings. Any future planning applications or potential review of Newick Neighbourhood Plan which considers housing allocations, will need to take into consideration policies within the adopted development plan.

In our view, the intention to only address minimum requirements is an unsound and obstructive approach as there is no flexibility should development not come forward for a whole variety of reasons.

Land at Woods Fruit Farm, Newick is a sustainable site and would enable the LPP2 to be more robust in its approach to housing delivery. This would ensure that the LPP2 has been more positively prepared for robustness of the plan at examination. We would reiterate that the council should seek to increase the provision of housing in the LPP2 to ensure a robust strategy for housing delivery which conforms with the requirements of the LPP1 and the NPPF.

Policy DM1: Planning Boundary

Policy DM1 states that within the development boundaries, as defined on the Proposals Maps, development will be permitted providing it accords with the policies of the development plan.

Accompanying the LPP2, Lewes District Council have published revised proposals maps, which have sought to amend the planning boundaries to include the allocations specified within

the LPP1, the LPP2 and made neighbourhood plans. We support the revision of the settlement Planning Boundaries to include all allocations.

Policy DM15: Provision of Outdoor Playing Space & Policy DM16: Children's Play Space in New Housing Development

Policy DM15 sets out the requirements for the provision of outdoor playing space, including outdoor sports, equipped/designated children's playing space and MUGAs and skateboard parks.

Policy DM16 provides a requirement for the provision of on-site Children's Play space, for developments of 20 or more units in accordance with the minimum standards set out in Policy DM15.

Whilst as a housing developer we fully support the inclusion of children's play space within new housing development, in our view this policy is overly prescriptive and lacks flexibility. On a small site which may be able to accommodate 20 units, the provision of an on-site play area to the standards set out in Policy DM15 may jeopardise the delivery of much needed housing, in our view a threshold of 20 units seems quite low and an unreasonable requirement. Additionally, the policy needs to provide clarity regarding the existing local provision and the need for on-site provision if this is deemed to be sufficient or can be upgraded to provide a wider betterment to the existing and future communities.

Woods Fruit Farm, Newick

Thakeham Homes recommends the site for residential development and as such seeks to promote the site in its entirety for residential development. The red line for the site has been appended to this representation in Appendix 1.

Newick Neighbourhood Plan

The western area of the site has the benefit of a neighbourhood plan allocation for 38 net additional dwellings.



Figure 1 Neighbourhood Plan Allocation of the Western Section of the Application Site

The site has continuously been promoted in its entirety, and whilst the eastern parcel did not emerge as a formal allocation in the Made Newick Neighbourhood Plan, it was considered as part of the Plan's evidence base.

The 'Newick Neighbourhood Plan: Sustainability Appraisal and Development Site Selection' report refers the site as Site 10, which extends the full site area:



Figure 2 Site 10 as assessed for housing capacity by Newick Parish

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In reference to Site 10, the Sustainability Appraisal notes the following:

'Though the whole of Site 10 was taken into account in ranking the sites only the western part of this Site is required to provide space for the balance of the 100 homes required'

The above note infers that, whilst the whole of Site 10 is suitable for housing on social, economic and environmental grounds, only a portion of it was required as an allocation with a view to meeting the then emerging JCS policy provision of 100 homes in Newick.

The Newick Neighbourhood Plan (NNP) was adopted in 2015, prior to the adoption of the LPP1 in 2016. Whilst the NNP progressed utilising the evidence available at that time, the NNP only sought to meet the housing requirement of the then emerging JCS of 100 units. During the JCS Examination the Inspector requested the wording changed to a 'minimum' of 100 units. It is therefore in our view the council should seek further allocations in Newick over and above the NNP allocations to ensure sufficient flexibility.

Lewes District Council 2018 Strategic Housing and Employment Land Availability Assessment (SHELAA)

The 2017 SHELAA assessed the site under reference 27NW, deeming the entire site at 3.6 hectares: suitable, available, achievable and deliverable for the delivery of 69 residential dwellings.

Given the councils own SHELAA assessment, we consider that the whole site could provide much needed housing development within the plan period, help provide the Local Plan with sufficient flexibility to be able to adapt to rapid change in accordance with the NPPF and support the provision of housing in accordance with policy SP2 of the adopted LPP1.

Conclusions

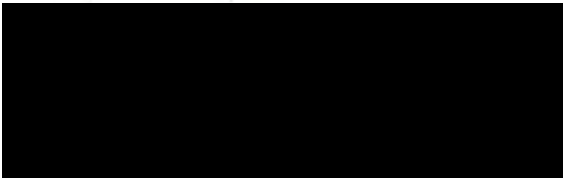
In conclusion, whilst the site has the benefit of a partial housing allocation within the Made Newick Neighbourhood Plan, it is clear the identified housing growth within the Spatial Policy 2 of the adopted LPP1 stipulates minimum requirements. Consequently, in our view the Council should seek to increase the provision of housing in the LPP2 to ensure a robust strategy for housing delivery which conforms with the requirements of SP2 and the NPPF.

We support the revision of the proposals map in accordance with the spatial requirements for housing delivery and would suggest that the council needs to revisit the requirements stipulated in policies DM15 and DM16 to ensure that these represent a feasible approach.

As detailed above, we are actively promoting the site for residential development and we have therefore demonstrated within these representations that we consider the site to be achievable, suitable and available for residential development.

We trust that these representations will be useful and clear and we would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Yours Sincerely,



Rachel Richardson
Senior Planner



THAKEHAM



Representation ID: REP/424/OM/ARepresentor Details:

Representor ID:	REP/424
Name:	Sarah Sutcliffe
Organisation:	Thakeham Homes
Consultation Body:	General
Stakeholder Type:	Developer/Landowner

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	sarah.sutcliffe@thakeham.com
Address:	Thakeham House, Summers Place Stane Street Billingshurst West Sussex RH14 9GN

Representation:

Policy/Section:	Housing Policy Context, Bishops Lane, Ringmer
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation: (SEE PDF FOR FULL REPRESENTATION)	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?



THAKEHAM

Planning Policy
Lewes District Council
Southover House
Southover Road
Lewes
BN7 1AB

5th November 2018

Dear Sir/Madam,

**Lewes Local Plan Part 2: Site Allocations and Development Management Policies
Development Plan Document – Pre-Submission version – Representation**

Re: Bishops Lane, Ringmer

Introduction

Thakeham Homes Ltd are submitting representations to the Lewes Local Plan Part 2: Site Allocations and Development Management Policies ('LPP2') as local stakeholders. Thakeham are a house builder based in Sussex with a track record for delivering high quality, sustainable schemes across the south east. We are progressing a number of potential development sites within this district at varying stages of the planning process, therefore our representations relate to the role of the emerging Local Plan in the delivery of the District's adopted housing objectives over the plan period.

We have made representations now on Local Plan Part 1 and recently on Local Plan Part 2: Site Allocations and Development Management policies (Regulation 18) dated 24th January 2018. We therefore have a long-standing interest in the Local Plan preparation which we support.

Local Plan Part 2 must have due regard to the primary document which is Local Plan Part 1, given it forms a strategic level plan for the whole district. We have concerns that this has not occurred.

These representations are submitted in respect of Thakeham Homes' interests at Bishops Lane, Ringmer ('the site'). This site is the land immediately to the east of Diplocks Industrial Estate, also known by SHELAA (2018) reference 21RG, for 75 net additional residential dwellings. A location plan for the site is appended to this representation at Appendix 1.

We confirm within these representations that this site is available and deliverable within the next five years and is set within highly sustainable locations. As such we wish to make representations on the policies contained within the Draft LPP2

Thakeham House, Summers Place, Stane Street, Billingshurst, West Sussex, RH14 9GN

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We wish to support the progression of the LPP2 and make comments within our representations on the basis that the site allocations document should be prepared to ensure conformity with the spatial requirements of the adopted Lewes Core Strategy: Local Plan Part 2 ('LPP1') and further site allocations should be sought to ensure that the requirements of the National Planning Policy Framework (NPPF) are met.

NPPF, paragraphs 10 and 11 set out the presumption in favour of sustainable development, with Paragraph 11(a) identifying a requirement for Local Planning Authorities '*to positively seek opportunities to meet the development needs of their area*'. Whilst Paragraph 119 states that "*Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs*".

Para 120 states that Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability."

Paragraph 9 also comments that, "Planning policies and decisions should play an active role in guiding development towards sustainable solutions"

In addition to our comments regarding spatial requirements we also wish to make representations to the proposed changes to the planning boundaries and the proposed 'Provision of Outdoor Playing Space' and 'Children's Play Space in New Housing Development' policy. As such, these representations also respond to Policy DM1, DM15 and DM16 of the Draft LPP2.

Spatial Distribution

Table 3 (Residential site allocations) of the Draft LPP2 provides an indication of the planned level of housing in the District, outside of the National Park:

Table 3 Planned level of housing, outside the National Park

Settlement	SP2 Planned housing growth	Neighbourhood Plan housing (adopted and emerging)	Residual housing growth to be identified in LPP2
Newhaven	425	425	-
Peacehaven & Telscombe	255	255	-
Seaford	185	185	-
Edge of Burgess Hill (within Wivelsfield Parish)	100	0	100
Barcombe Cross	30	0	30
North Chailey	30	0	30
South Chailey	10	0	10
Cooksbridge	30	0	30
Newick	100	100	-
Plumpton Green	50	50	-
Burgmer & Broyle Side	215	185	30
Wivelsfield Green	30	34	-
To be determined	200	-	200
Total	1,660	1,250	432

KEY	
■	Housing growth to be delivered through neighbourhood plans
■	Housing growth identified in 'made' neighbourhood plans
■	Housing growth identified in Local Plan Part 2

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Table 3 provides the residual housing growth to be identified in LPP2, which in the case of Ringmer and Broyle Side is 32 net additional dwellings.

Although this has increased from previously being 12 (as stated in our earlier representation in January 2018) it is still unacceptably low as these figures are a minimum and all sites should be assumed to come forward.

Whilst Spatial Policy 2 of the adopted LPP1 makes clear that all planned housing growth numbers are stipulated as minimums, and the LPP2 does state at paragraph 2.7 that ‘It should be borne in mind that the figures contained within the Spatial Policy 2 are expressed as minimums and where appropriate growth should exceed this minimum figure’, in our view the above table does not address these figures as minimum requirements.

It is clear from Table 2 that most parishes designated to produce a neighbourhood plan, have not sought to exceed their minimum requirements within adopted and emerging Neighbourhood Plans. The Council has not sought to allocate sites within the LPP2 over and above the housing growth identified within these adopted and emerging Neighbourhood Plans, thus only meeting the minimum requirement for most settlements. In our view, this falls short of the requirements of the NPPF as the Plan has not been positively prepared to meet the District’s development needs. Additionally, and with particular relevance to Thakeham Homes’ interests at Lewes Road, Ringmer, the Ringmer Neighbourhood Plan was adopted prior to the Core Strategy. Therefore, as the latest development plan adopted, we would continue to maintain that the Core Strategy requirements should take precedent.

This is particularly since Regulation 18 stage of LPP2, there has been the publication of the revised NPPF (July 2018) which provides additional weight to promoting house building and in maintaining a sufficient supply and delivery of homes. Specifically, Paragraph 59 states:-

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”.

Paragraph 16 (a and b) of the NPPF states that Local Plans should “be prepared with the objective of contributing to the achievement of sustainable development and be prepared positively, in a way that is aspirational but deliverable”, whilst Paragraph 11(a) makes clear that Local Plans should ensure flexibility to adapt to rapid change. The LPP2 has identified at Table 5 that most parishes have not sought to exceed their minimum requirements within adopted and emerging Neighbourhood Plans. The Council has not sought to allocate sites within the LPP2 over and above the housing growth identified within these adopted and emerging Neighbourhood Plans, thus only meeting the minimum requirement for most settlements. In our view, this falls short of the requirements of the NPPF as the plan has not been positively prepared to meet the district’s development needs. Additionally, some Neighbourhood Plans, such as the Ringmer Neighbourhood Plan were adopted prior to the Core Strategy. Therefore, as the latest development plan adopted, the Core Strategy requirements should take precedent.

Table 3 shows that Ringmer has a shortfall of 32 dwellings. As all the requirements are minimums it could be questioned as to why the council are not seeking more sites or pursuing opportunities where more sites are available for development.

There is a small difference of 32 dwellings within the Ringmer Neighbourhood Plan once the overlap with commitments in Local Plan Part 1 (Table 5, p53) and the strategic allocation Spatial Policy 6: Land north of Bishops Lane, have been taken into account. A detailed explanation is provided within the Ringmer and Broyle Side section (paragraphs 2.118 to 2.121).

'2.118 Spatial Policy 2 of the Local Plan Part 1 sets the requirement for a minimum 215 net additional dwellings to be provided within Ringmer and Broyle Side. Ringmer Parish Council has a 'made' neighbourhood plan which contains a number of housing policies and allocations. A number of these allocated sites have since gained planning permission.

2.119 As referred to earlier in paragraph 2.8, a number of sites within Policy 6.4 of the Ringmer Neighbourhood Plan (RNP) overlap with commitments or the strategic allocation, Land north of Bishops Lane, identified in Spatial Policy 2 and Table 5 of Local Plan Part 1. The removal of these duplications results in a total of 183 net additional dwellings identified within the RNP; a shortfall of 32 net additional dwellings, against the planned housing growth figure of minimum 215 net additional dwellings.

2.120 The shortfall was recognised and discussed at the Local Plan Part 1 Examination, during which it was agreed that the retained 'saved' 2003 Lewes District Local Plan housing allocation RG1: Caburn Field was highly likely to deliver above the original target minimum of 40 dwellings (the number contained within the commitments figure for Spatial Policy 2). An additional 20 dwellings, thereby providing a total of 60 net additional dwellings, was considered at that time to be a reasonable anticipated capacity for an eventual proposal.

2.121 The increase in capacity was partly due to the inclusion of adjacent Lewes District Council owned land. A further 12 dwellings, however, is still required to meet the minimum of 215 net additional dwellings. Progress has since been made on the development proposals for this site, which indicate a yield of 96 dwellings. It is therefore proposed to allocate Caburn Field for approximately 90, meeting the shortfall of 32 and providing an additional 18 over the minimum of 215 net additional dwellings. This represents an uplift of 50 over and above the 'saved' 2003 allocation.

Paragraph 2.124. then goes on to state that 'The housing growth and Ringmer and Broyle Side, as identified within Local Plan Part 1, is limited due to current highways constraints of the B2192. Current identified junction improvements, to be delivered by the strategic site at Bishops Lane, allow for a total of 385 net additional dwellings to be accommodated within the settlement. Due to the junction capacity constraints there is effectively a cap on development in Ringmer and Broyle Side beyond the planned 385 net additional dwellings. This is even allowing for the planned junction improvements that will be delivered through the strategic allocation at Bishops Lane.'

Paragraph 2.11 discussed the overall requirements for the LPP2 following the assessment of individual settlement requirements. *"The Local Plan Part 2 is therefore required to deliver a minimum 127 net additional dwellings. In respect to Table 5 it shows that Local Plan Part 2 is*

meeting the minimum required figures". Again, this should not address minimum requirements as there is no flexibility should development not come forward for a whole variety of reasons.

It is noted in respect to Table 5 that in the case of Ringmer and Broyle Side that 50 no. units are allocated in LPP2. It should in fact be upwards of this number to take full account of national planning policy.

Land at Bishops Lane, Ringmer is a sustainable site and its inclusion as an additional allocation would enable LPP2 to be more robust in its approach to housing delivery. This would ensure that LPP2 has been more positively prepared for the robustness of the Plan at Examination. We would reiterate that the Council should seek to increase the provision of housing in the LPP2 to ensure a robust strategy for housing delivery which conforms with the requirements of SP2 and the NPPF.

Policy DM1: Planning Boundary

Policy DM1 states that within the development boundaries, as defined on the Proposals Maps, development will be permitted providing it accords with the policies of the development plan.

Accompanying the LPP2, Lewes District Council have published revised proposals maps which have sought to amend the planning boundaries to include the allocations specified within the LPP1, the LPP2 and made neighbourhood plans. We support the revision of the settlement Planning Boundaries to include all allocations.

Policy DM15: Provision of Outdoor Playing Space & Policy DM16: Children's Play Space in New Housing Development

Policy DM15 sets out the requirements for the provision of outdoor playing space, including outdoor sports, equipped/designated children's playing space and MUGAs and skateboard parks.

Policy DM16 provides a requirement for the provision of on-site Children's Play space, for developments of 20 or more units in accordance with the minimum standards set out in Policy DM15.

Whilst as a housing developer we fully support the inclusion of children's play space within new housing development, in our view this policy is overly prescriptive and lacks flexibility. On a small site which may be able to accommodate 20 units, the provision of an on-site play area to the standards set out in Policy DM15 may jeopardise the delivery of much needed housing, in our view a threshold of 20 units seems quite low and an unreasonable requirement. Additionally, the policy needs to provide clarity regarding the existing local provision and the need for on-site provision if this is deemed to be sufficient or can be upgraded to provide a wider betterment to the existing and future communities.

Bishops Lane, Ringmer

Thakeham Homes recommends the site for residential development and as such seeks to promote the site in its entirety for residential development. The red line for the site has been appended to this representation in Appendix 1.

Land north of Bishops Lane is included in the Lewes District Council SHELAA (2018) under reference 21RG. The site is around 2.5 ha in size and a yield of 75 dwellings is suggested, the site has been assessed as 'suitable, available and achievable' with the rationale for this assessment stating:

'Site is actively being promoted through Part 2 of Local Plan. Greenfield site adjacent to planning boundary, within walking distance of bus stop and local shops. Area of potential archaeological interest. ESCC landscape architect considers that the area north of Bishops Lane should be assessed as a unit to identify developable areas and suitable landscape setting to redefine village edge. LC S concludes wider landscape character area to have medium capacity for change. Relocation of right of way required. Significant development in Ringmer would impact upon Earwig Corner junction. Based on current information and views of ESCC highways this is considered possible and achievable. Access can be achieved independently or through one of the adjacent sites. Development of this scale is likely to require an upgrade to the Neaves Lane Waste Water Treatment Works, which is considered deliverable within the next five years, which is considered deliverable within the next five years. Site is not identified for housing within the Ringmer Neighbourhood Plan.'

As per the Council's own SHELAA assessment, the site is considered to be available, suitable and achievable, with no evident constraints that would prevent the delivery of housing on the site, and therefore considered deliverable. As such, we consider that the whole of the site could provide much needed housing development within the plan period, helping to provide the Local Plan with sufficient flexibility to be able to adapt to rapid change in accordance with the NPPF and support the provision of housing in accordance with policy SP2 of the adopted LPP1.

Conclusions

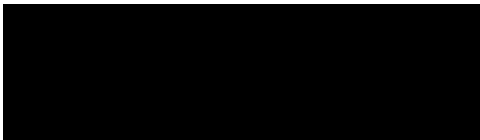
In conclusion, it is clear the identified housing growth within the Spatial Policy 2 of the adopted LPP1 stipulates minimum requirements. Consequently, in our view the Council should seek to increase the provision of housing in the LPP2 to ensure a robust strategy for housing delivery which conforms with the requirements of SP2 and the NPPF.

We support the revision of the proposals map in accordance with the spatial requirements for housing delivery and would suggest that the council needs to revisit the requirements stipulated in policies DM15 and DM16 to ensure that these represent a feasible approach.

As detailed above, we are actively promoting the site for residential development and we have therefore demonstrated within these representations that we consider the site to be achievable, suitable and available for residential development.

We trust that these representations will be useful and clear and we would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Yours Sincerely,



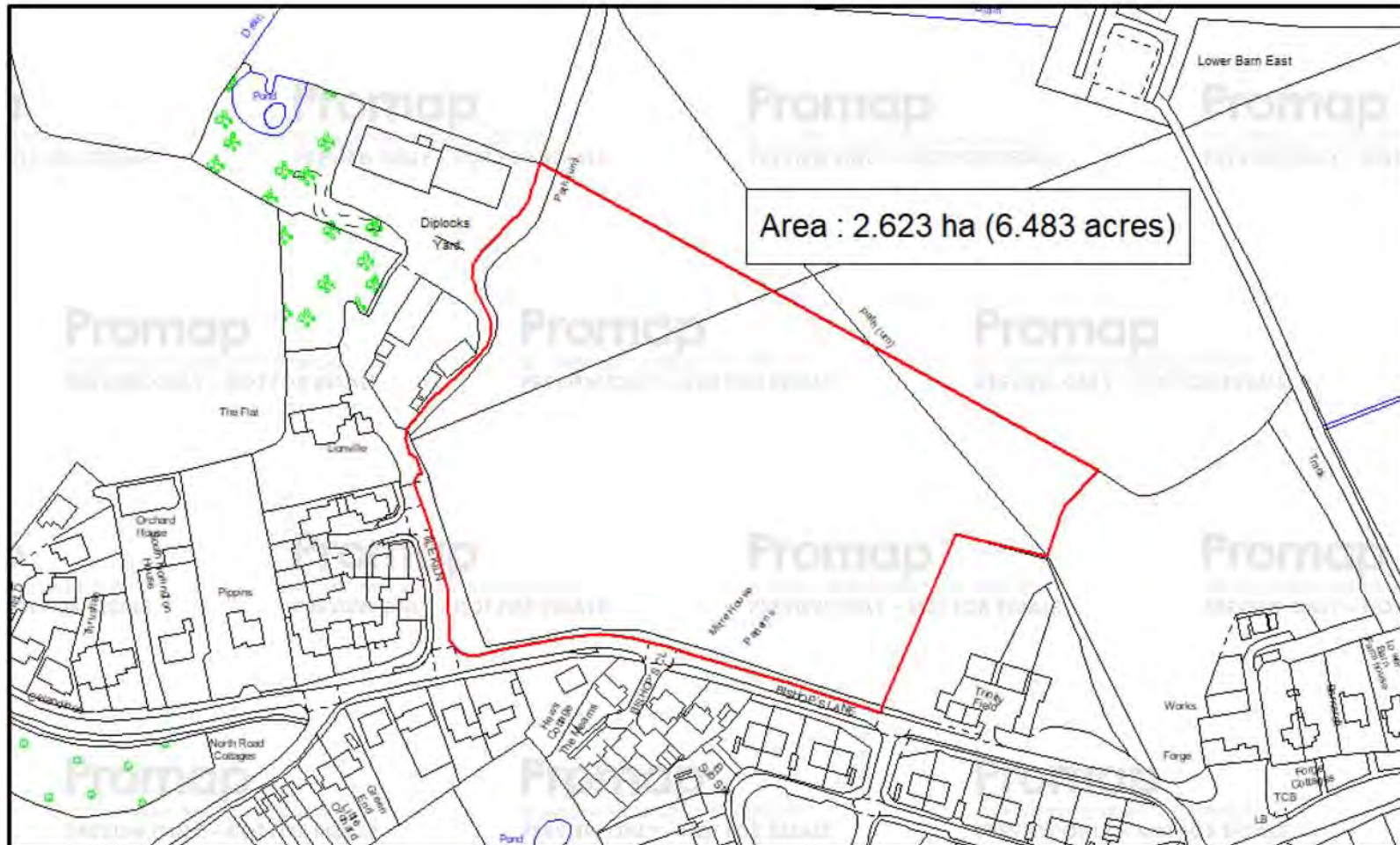
Rachel Richardson

Senior Planner

Enc. Appendix 1 - Location Plan



THAKEHAM



Land at Bishops Lane, Ringmer

Representation ID: REP/424/OM/B
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Representor Details:

Representor ID:	REP/424
Name:	Sarah Sutcliffe
Organisation:	Thakeham Homes
Consultation Body:	General
Stakeholder Type:	Developer/Landowner

Agent Details:

Name:
Organisation:

Contact Details:

Email Address:	sarah.sutcliffe@thakeham.com
Address:	Thakeham House, Summers Place Stane Street Billingshurst West Sussex RH14 9GN

Representation:

Policy/Section:	Housing Policy Context, Lewes Road, Ringmer
<i>Do you consider the document to be:</i>	
Legally Compliant:	
Sound:	
Representation:	
(SEE PDF FOR FULL REPRESENTATION)	
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?
Why do you feel it is necessary to participate at the Examination in Public?



THAKEHAM

Planning Policy
Lewes District Council
Southover House
Southover Road
Lewes
BN7 1AB

5th November 2018

Dear Sir/Madam,

**Lewes Local Plan Part 2: Site Allocations and Development Management Policies
Development Plan Document Consultation (Regulation 18) – Representation**

Re: Land at Lewes Road, Ringmer

Introduction

Thakeham Homes Ltd are submitting representations to the Lewes Local Plan Part 2: Site Allocations and Development Management Policies ('LPP2') as local stakeholders. Thakeham are a house builder based in Sussex with a track record for delivering high quality, sustainable scheme across the south east. We are progressing a number of potential development sites within this district at varying stages of the planning process, therefore our representations relate to the role of the emerging Local Plan in the delivery of the District's adopted housing objectives over the plan period.

We have made representations now on Local Plan Part 1 and recently on Local Plan Part 2: Site Allocations and Development Management policies (Regulation 18) dated 24th January 2018. We therefore have a long-standing interest in the Local Plan preparation which we support.

Local Plan Part 2 must have due regard to the primary document which is Local Plan Part 1, given it forms a strategic level plan for the whole district. We have concerns that this has not occurred.

These representations are submitted in respect of Thakeham Homes' interests at Lewes Road, Ringmer ('the site'). Thakeham has a developer interest in a site north of Lewes Road available for development that is approximately 4.8 ha in size. A location plan for the site is appended to this representation at Appendix 1.

We confirm within these representations that this site is available and deliverable within the next five years and are set within highly sustainable locations. As such we wish to make representations on the policies contained within the Draft LPP2.

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We wish to support the progression of the LPP2 and make comments within our representations on the basis that the site allocations document should be prepared to ensure conformity with the spatial requirements of the adopted Lewes Core Strategy: Local Plan Part 1 ('LPP1') and further site allocations should be sought to ensure that the requirements of the National Planning Policy Framework (NPPF) are met.

NPPF, paragraphs 10 and 11 set out the presumption in favour of sustainable development, with Paragraph 11(a) identifying a requirement for Local Planning Authorities '*to positively seek opportunities to meet the development needs of their area*'. Whilst Paragraph 119 states that "*Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs*".

Para 120 states that Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability."

Paragraph 9 also comments that, "Planning policies and decisions should play an active role in guiding development towards sustainable solutions"

In addition to our comments regarding spatial requirements we also wish to make representations to the proposed changes to the planning boundaries and the proposed 'Provision of Outdoor Playing Space' and 'Children's Play Space in New Housing Development' policy. As such, these representations also respond to Policy DM1, DM15 and DM16 of the Draft LPP2.

Spatial Distribution

Table 3 (Residential site allocations) of the Draft LPP2 provides an indication of the planned level of housing in the District, outside of the National Park:

Table 3 Planned level of housing, outside the National Park

Settlement	SP2 Planned housing growth	Neighbourhood Plan housing (adopted and emerging)	Residual housing growth to be identified in LPP2
Newhaven	425	425	0
Peacehaven & Telscombe	255	255	0
Seaford	185	185	0
Edge of Burgess Hill (within Wivelsfield Parish)	100	0	100
Bacombe Cross	30	0	30
North Chisleigh	30	0	30
South Chisleigh	10	0	10
Cooksbridge	30	0	30
Newick	100	100	0
Plumpton Green	50	50	0
Ringmer & Broyle Side	215	185	30
Wivelsfield Green	30	30	0
To be determined	200	0	200
Total	1,660	1,250	432

KEY
 Housing growth to be delivered through neighbourhood plans
 Housing growth identified in 'made' neighbourhood plans
 Housing growth identified in Local Plan Part 2

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Table 3 provides the residual housing growth to be identified in LPP2, which in the case of Ringmer and Broyle Side is 32 net additional dwellings.

Although this has increased from previously being 12 (as stated in our earlier representation in January 2018) it is still unacceptably low as these figures are a minimum and all sites should be assumed to come forward.

Whilst Spatial Policy 2 of the adopted LPP1 makes clear that all planned housing growth numbers are stipulated as minimums, and the LPP2 does state at paragraph 2.7 that ‘It should be borne in mind that the figures contained within the Spatial Policy 2 are expressed as minimums and where appropriate growth should exceed this minimum figure’, in our view the above table does not address these figures as minimum requirements.

It is clear from Table 2 that most parishes designated to produce a neighbourhood plan, have not sought to exceed their minimum requirements within adopted and emerging Neighbourhood Plans. The Council has not sought to allocate sites within the LPP2 over and above the housing growth identified within these adopted and emerging Neighbourhood Plans, thus only meeting the minimum requirement for most settlements. In our view, this falls short of the requirements of the NPPF as the Plan has not been positively prepared to meet the District’s development needs. Additionally, and with particular relevance to Thakeham Homes’ interests at Lewes Road, Ringmer, the Ringmer Neighbourhood Plan was adopted prior to the Core Strategy. Therefore, as the latest development plan adopted, we would continue to maintain that the Core Strategy requirements should take precedent.

This is particularly since Regulation 18 stage of LPP2, there has been the publication of the revised NPPF (July 2018) which provides additional weight to promoting house building and in maintaining a sufficient supply and delivery of homes. Specifically, Paragraph 59 states:-

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”.

Paragraph 16 (a and b) of the NPPF states that Local Plans should “be prepared with the objective of contributing to the achievement of sustainable development and be prepared positively, in a way that is aspirational but deliverable”, whilst Paragraph 11(a) makes clear that Local Plans should ensure flexibility to adapt to rapid change. The LPP2 has identified at Table 5 that most parishes have not sought to exceed their minimum requirements within adopted and emerging Neighbourhood Plans. The Council has not sought to allocate sites within the LPP2 over and above the housing growth identified within these adopted and emerging Neighbourhood Plans, thus only meeting the minimum requirement for most settlements. In our view, this falls short of the requirements of the NPPF as the plan has not been positively prepared to meet the district’s development needs. Additionally, some Neighbourhood Plans, such as the Ringmer Neighbourhood Plan were adopted prior to the Core Strategy. Therefore, as the latest development plan adopted, the Core Strategy requirements should take precedent.

Table 3 shows that Ringmer has a shortfall of 32 dwellings. As all the requirements are minimums it could be questioned as to why the council are not seeking more sites or pursuing opportunities where more sites are available for development.

There is a small difference of 32 dwellings within the Ringmer Neighbourhood Plan once the overlap with commitments in Local Plan Part 1 (Table 5, p53) and the strategic allocation Spatial Policy 6: Land north of Bishops Lane, have been taken into account. A detailed explanation is provided within the Ringmer and Broyle Side section (paragraphs 2.118 to 2.121).

'2.118 Spatial Policy 2 of the Local Plan Part 1 sets the requirement for a minimum 215 net additional dwellings to be provided within Ringmer and Broyle Side. Ringmer Parish Council has a 'made' neighbourhood plan which contains a number of housing policies and allocations. A number of these allocated sites have since gained planning permission.

2.119 As referred to earlier in paragraph 2.8, a number of sites within Policy 6.4 of the Ringmer Neighbourhood Plan (RNP) overlap with commitments or the strategic allocation, Land north of Bishops Lane, identified in Spatial Policy 2 and Table 5 of Local Plan Part 1. The removal of these duplications results in a total of 183 net additional dwellings identified within the RNP; a shortfall of 32 net additional dwellings, against the planned housing growth figure of minimum 215 net additional dwellings.

2.120 The shortfall was recognised and discussed at the Local Plan Part 1 Examination, during which it was agreed that the retained 'saved' 2003 Lewes District Local Plan housing allocation RG1: Caburn Field was highly likely to deliver above the original target minimum of 40 dwellings (the number contained within the commitments figure for Spatial Policy 2). An additional 20 dwellings, thereby providing a total of 60 net additional dwellings, was considered at that time to be a reasonable anticipated capacity for an eventual proposal.

2.121 The increase in capacity was partly due to the inclusion of adjacent Lewes District Council owned land. A further 12 dwellings, however, is still required to meet the minimum of 215 net additional dwellings. Progress has since been made on the development proposals for this site, which indicate a yield of 96 dwellings. It is therefore proposed to allocate Caburn Field for approximately 90, meeting the shortfall of 32 and providing an additional 18 over the minimum of 215 net additional dwellings. This represents an uplift of 50 over and above the 'saved' 2003 allocation.

Paragraph 2.124. then goes on to state that 'The housing growth and Ringmer and Broyle Side, as identified within Local Plan Part 1, is limited due to current highways constraints of the B2192. Current identified junction improvements, to be delivered by the strategic site at Bishops Lane, allow for a total of 385 net additional dwellings to be accommodated within the settlement. Due to the junction capacity constraints there is effectively a cap on development in Ringmer and Broyle Side beyond the planned 385 net additional dwellings. This is even allowing for the planned junction improvements that will be delivered through the strategic allocation at Bishops Lane.'

Paragraph 2.11 discussed the overall requirements for the LPP2 following the assessment of individual settlement requirements. *"The Local Plan Part 2 is therefore required to deliver a minimum 127 net additional dwellings. In respect to Table 5 it shows that Local Plan Part 2 is meeting the minimum required figures".* Again, this should not address minimum requirements as there is no flexibility should development not come forward for a whole variety of reasons.

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It is noted in respect to Table 5 that in the case of Ringmer and Broyle Side that 50 no. units are allocated in LPP2. It should in fact be upwards of this number to take full account of national planning policy.

Land at Lewes Road, Ringmer is a sustainable site and its inclusion as an additional allocation would enable LPP2 to be more robust in its approach to housing delivery. This would ensure that LPP2 has been more positively prepared for the robustness of the Plan at Examination. We would reiterate that the Council should seek to increase the provision of housing in the LPP2 to ensure a robust strategy for housing delivery which conforms with the requirements of SP2 and the NPPF. This site could deliver an additional 90 houses which would only seek to strengthen the Council's position in terms of their housing land supply.

Policy DM1: Planning Boundary

Policy DM1 states that within the development boundaries, as defined on the Proposals Maps, development will be permitted providing it accords with the policies of the development plan.

Accompanying the LPP2, Lewes District Council have published revised proposals maps which have sought to amend the planning boundaries to include the allocations specified within the LPP1, the LPP2 and made neighbourhood plans. We support the revision of the settlement Planning Boundaries.

Policy DM15: Provision of Outdoor Playing Space & Policy DM16: Children's Play Space in New Housing Development

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Whilst as a housing developer we fully support the inclusion of children's play space within new housing development, in our view this policy is overly prescriptive and lacks flexibility. On a small site which may be able to accommodate 20 units, the provision of an on-site play area to the standards set out in Policy DM15 may jeopardise the delivery of much needed housing, in our view a threshold of 20 units seems quite low and an unreasonable requirement. Additionally, the policy needs to provide clarity regarding the existing local provision and the need for on-site provision if this is deemed to be sufficient or can be upgraded to provide a wider betterment to the existing and future communities.

Land at Lewes Road, Ringmer

Thakeham Homes recommends the sites for residential development and as such seeks to promote the sites in their entirety for residential development. The site has been assessed in

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the Council's latest SHELAA (2018) as not deliverable or developable, however in our view the assessment raises no constraints which could not be suitably overcome as part of any future planning application. The site north of Lewes Road we believe is suitable, available and achievable. The red line for the sites has been appended to this representation in Appendix 1.

Availability, Suitability and Achievability

We wish to promote the site in its entirety for residential development and can confirm that the site is Available, Suitable, Achievable and therefore deliverable within the next 5 years.

Availability

As highlighted within this and previous representations, the site is controlled by Thakeham Homes Ltd and are actively being promoted for residential development.

Thakeham has a proven track record for delivering a number of high quality residential schemes across Surrey, Sussex and Hampshire and will be seeking to deliver a range of dwellings on the sites.

Suitability

The site is located on the north eastern edge of Ringmer village and is within walking distance of the various local amenities of Ringmer. Ringmer falls in the third tier of the settlement hierarchy and is therefore considered to have a range of services and facilities to meet the needs of the existing community as well as providing key services for surrounding rural villages. The site has good transport links, with a frequent bus service available from a number of stops around the village.

Achievability

Given the acute housing need within the District and the location of the site, it is considered that there is a reasonable prospect of residential development being achieved in the next five years.

As stated above, Thakeham has a proven track record for delivering schemes of a similar size and scale throughout Surrey, Sussex and Hampshire, and has the capacity to deliver the development of the site to provide much needed new homes within the first 5 years of the plan period.

Deliverability

For the reasons above, the site is considered to be available, suitable and achievable, and therefore deliverable in accordance with the NPPG. As such, we consider that the site could provide much needed housing development within the plan period, help provide the Local Plan with sufficient flexibility to be able to adapt to rapid change in accordance with the NPPF and support the provision of housing in accordance with policy SP2 of the adopted LPP1.

Conclusions

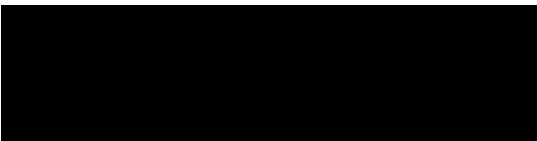
In conclusion, it is clear the identified housing growth within the Spatial Policy 2 of the adopted LPP1 stipulates minimum requirements. Consequently, in our view the Council should seek to increase the provision of housing in the LPP2 to ensure a robust strategy for housing delivery which conforms with the requirements of SP2 and the NPPF.

We support the revision of the proposals map in accordance with the spatial requirements for housing delivery and would suggest that the Council needs to revisit the requirements stipulated in policies DM15 and DM16 to ensure that these represent a feasible approach.

As detailed above, we are actively promoting the site for residential development and we have therefore demonstrated within these representations that we consider the site to be achievable, suitable and available for residential development.

We trust that these representations will be useful and clear and we would be grateful for confirmation of receipt. In the meantime, please do not hesitate to contact me if you have any queries or require any further information.

Yours Sincerely,



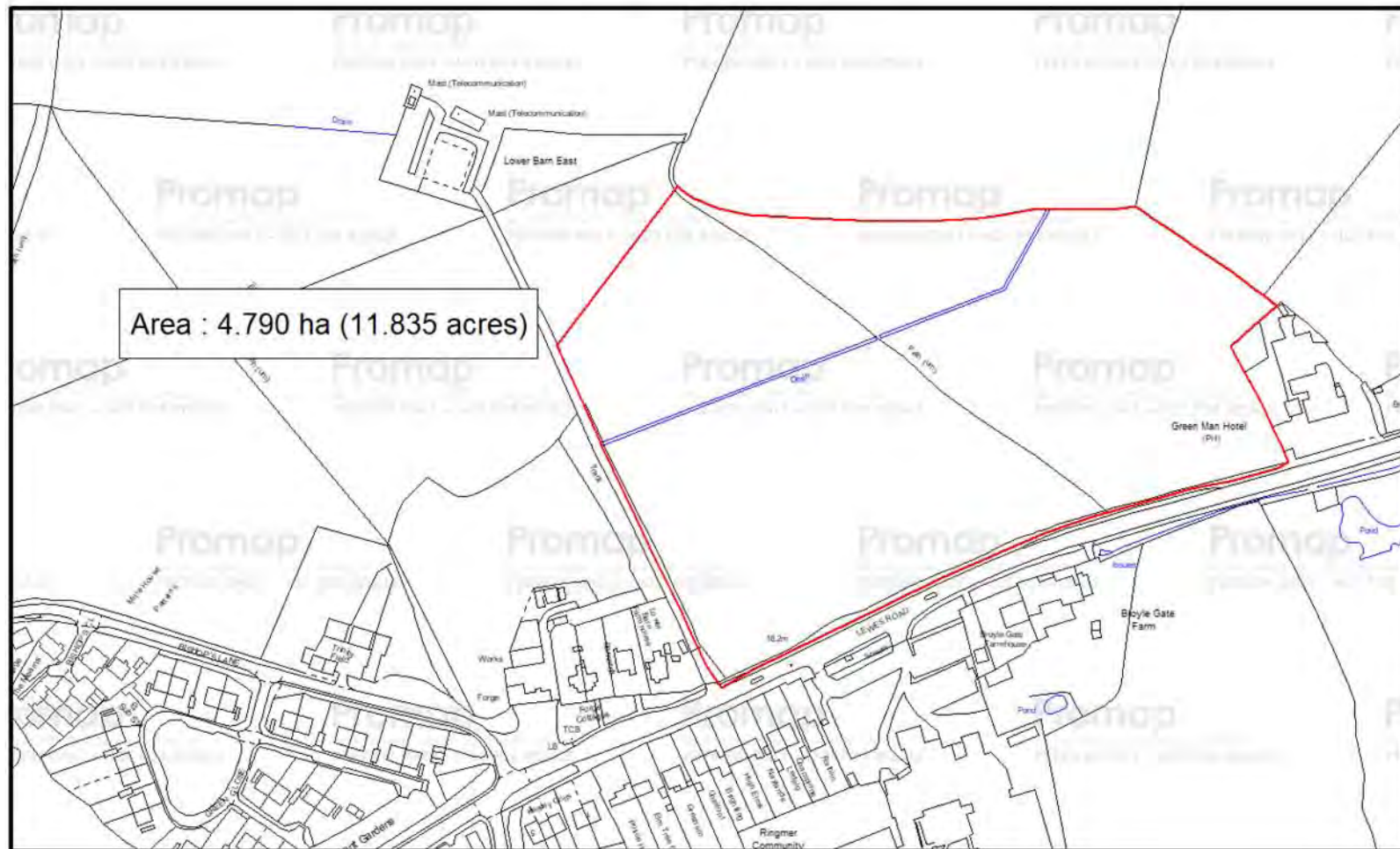
Rachel Richardson

Senior Planner

Enc. Appendix 1 - Location Plan



THAKEHAM



Land at Lewes Road, Ringmer

Representation ID: REP/491/OMRepresentor Details:

Representor ID:	REP/491
Name:	
Organisation:	Taylor Wimpey South Thames Ltd
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:	Steven Brown
Organisation:	Woolf Bond Planning

Contact Details:

Email Address:	s.brown@woolfbond.co.uk
Address:	The Mitfords Basingstoke Road Three Mile Cross Berkshire RG7 1AT

Representation:

Policy/Section:	Housing Policy Context, Omission Site
<i>Do you consider the document to be:</i>	
Legally Compliant:	No
Sound:	Yes Not Positively Prepared Not Justified Not Effective Not Consistent with national policy
Representation:	(SEE PDF FOR FULL REPRESENTATION)

What changes do you suggest to make the document legally compliant or sound?

Do you consider it necessary to participate at the Examination in Public?	Yes
--	------------

Why do you feel it is necessary to participate at the Examination in Public?



Woolf Bond Planning

Chartered Town Planning Consultants

Our Ref: SB/6354

Email: s.brown@woolfbond.co.uk

2nd November 2018

Planning Policy,
Lewes District Council,
Southover House,
Southover Road,
Lewes,
BN7 1AB

Dear Sirs

Lewes District Council – Local Plan Part 2: Site Allocations and Development Management Policies Pre Submission Consultation

Representations on Behalf of Taylor Wimpey South Thames Ltd.

INTRODUCTION

Background

We refer to the above consultation upon the Pre-submission version of the Local Plan Part 2 and write on behalf of our clients, Taylor Wimpey South Thames Ltd., concerning the omission of land at Greenhill Way/Ridgeway, Haywards Heath as a housing allocation (edged red on Plan WBP1 attached).

OMISSION SITE LAND AT GREENHILL WAY/RIDGE WAY, HAYWARDS HEATH

Development Plan Context

The Local Plan Part 1 Inspector issued his initial conclusions regarding the Plan's soundness in February 2014. His conclusions advised that the District had passed the Duty to Cooperate and that full, objectively assessed housing needs (OAN) had been satisfactorily identified. However, the Inspector considered that there was a need for the District to carry out further work in attempting to meet as much of the defined OAN as possible.

This is confirmed in the following two paragraphs taken from the previous appeal decision, which includes the following assessment of the sustainability merits of the site:

‘However, despite the foregoing, I am not at all convinced that “no stone has been left unturned” by the Councils, in terms of seeking as many suitable and appropriate sites for new housing as possible that are realistically deliverable in sustainable locations across the plan area’.

...

‘My preliminary conclusion is that the new housing provision in the plan has to go up to a minimum of 6,900 in total (from 5,790 as now), or at least 345 dwellings a year on average over the plan period’.

Spatial Context

Lewes District is constrained as to further extensions to its principal settlements given the high proportion of the District that is covered by the South Downs National Park and two sites designated as Special Area of Conservation (“SAC”). Further the Ashdown Forest is also a designated SPA and is located within close proximity to the District’s borders. In sequential terms, development on land located outside such designations should be brought forward first.

It should be noted that the housing requirements set out in Spatial Policy 2 of Local Plan Part 1 are clearly expressed as minimums and where appropriate growth should exceed this minimum figure. This is particularly the case given the requirement for additional sites to be released for development in order to meet the local housing need identified in accordance with the standard methodology (as set out in the NPPF) from May 2021 onwards (at which point the strategic housing requirements set out in the Local Plan Part 1 will be more than five years old).

Moreover, and as demonstrated in the Council’s five year housing land supply position statement as at April 2018, the Council is unable to demonstrate a five year supply of deliverable housing land when assessed at the District level or in that part of the District excluding the national Park.

This further justifies the need for additional allocations, including possible reserve sites.

Our client’s site offers one such location where this can be achieved in a sustainable manner.

In terms of the site’s location, the site lies adjacent to the Haywards Heath settlement boundary. Haywards Heath is defined as a ‘Secondary Regional Centre’ within the proposed settlement hierarchy contained within the Council’s Core Strategy and is above any settlement located within Lewes District itself in the settlement hierarchy. It is noted that growth adjacent to Haywards Heath was referred to by the LDC planning policy manager at the EiP Issue 4 session considering Local Plan Part 1 as an ‘extremely sustainable location’.

The subject site adjoins the Haywards Heath urban area and therefore represents one of the most sustainable locations in helping to meet the District’s housing requirements (including that for affordable). We note the sustainability credentials of greenfield releases at Haywards Heath were further acknowledged by the Section 78 Inspector in allowing the appeal on the northern part of the Spatial Policy 4 allocation:

‘...that if greenfield housing development is needed and justified, as is demonstrably the case in Lewes district, there are in principle few better locations for it than on the edges of large established settlements (in this case, Haywards Heath), which contain major concentrations of services, facilities and other infrastructure. And that is reflected in the site’s draft allocation for housing in the emerging CS’ (paragraph 30).

In addition, it should be noted that the housing requirements set out in Spatial Policy 2 of Local Plan Part 1 are clearly expressed as minimums and where appropriate growth should exceed this minimum figure. Our client’s site offers one such location where this can be achieved in a sustainable manner.

For the above reasons we are of the strong view that the potential of the subject 2.5ha site that forms land adjoining Haywards Heath (within Wivelsfield Parish) should be identified in the Local Plan Part 2 as a housing allocation. The construction of the housing development to the north is now very advanced and therefore the omission site could be delivered inside a 5 year period and therefore soon after the adoption of Local Plan Part 2.

Site Characteristics

As you will be aware our client’s developed land to the north of the subject site. This comprises approximately 8.5ha and benefits from detailed permission which will be built out by Q4 in 2019.

These representations specifically relate to a residual 2.5ha, edged red on Plan WBP1 and located to the south of the allocated site. For contextual purposes, the Spatial Policy 5 allocation is edged blue on Plan WBP1.

The site comprises approximately 2.5ha and is located adjacent to the Haywards Heath settlement boundary. It is roughly rectangular in shape and is bound by the Asylum Wood Local Nature Reserve to the northwest, Colwell Lane to the southeast and agricultural fields to the south.

As illustrated on the image below, the site is bound by a mature tree belt on its southern boundary and woodland to the west and east. The site’s northern boundary is formed by some existing vegetation but this is considerably less dense than that located on the site’s southern boundary. In terms of topography, the site slopes from its southwestern corner towards its northeastern corner.

The site is sustainably located and well related to Haywards Heath with its range of services, facilities and employment opportunities.

It is anticipated that access into the site would be via the land to the north that benefits from an established access from Greenhill Way/Ridge Way. The land is located close to the main A272 and nearby bus services run to Haywards Heath Town Centre, Uckfield, Burgess Hill and Brighton. Existing bus services are to be diverted into the land to the north and will further enhance the sustainable credentials of the site and opportunities for residents to travel by bus. Haywards Heath railway station provides a major interchange for regular services to London, Gatwick and the South Coast and would be accessible from the site via either bike or bus.



The site is suitably located with regard to key services, including primary and secondary schools and the Princess Royal Hospital. By virtue of Haywards Heath's designation as a 'Secondary Regional Centre', the site is well placed with regard to local employment opportunities.

The above confirms that the proposed development at Greenhill Way offers a sustainable development location benefitting from a number of key services and facilities within close proximity to the site. The site also offers a logical development extension to the approved proposals abutting the north of the site.

Proposed Scheme

The above discussion has confirmed that there is a need for housing in sustainable locations and that the site is not constrained by statutory designations. Accordingly, our masterplanners have developed a Concept Masterplan (Ref. CSa/2635/100) to cover the site. This exercise has confirmed that the site could come forward for up to approximately 80 dwellings. This includes a proposed density of approximately 35 dwellings per hectare. Such a proposal has been assessed as appropriate having regard to the site's topography and technical considerations.

It is proposed that the masterplan for the site will include further areas of incidental open space to supplement the areas to come forward on the site to the north. The scheme retains the existing screening on the site boundaries and properties could be designed

around open spaces in varying sizes and scales to provide a varied street scene. Vehicular access links into the wider site via the northern boundary.

On site environmental mitigation measures include potential SuDS features within landscaped areas. Further a 15 metre buffer to the ancient woodland edge is provided as per the approach taken on the wider site. The existing landscape belt on the site's southern boundary is retained.

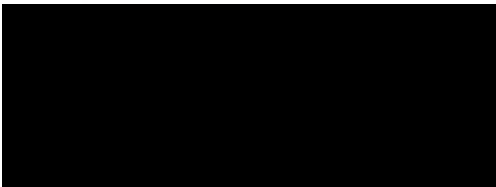
Proposed Change:

Land at Greenhill Way/Ridge Way, Haywards Heath to be allocated for up to approximately 80 dwellings.

SUMMARY

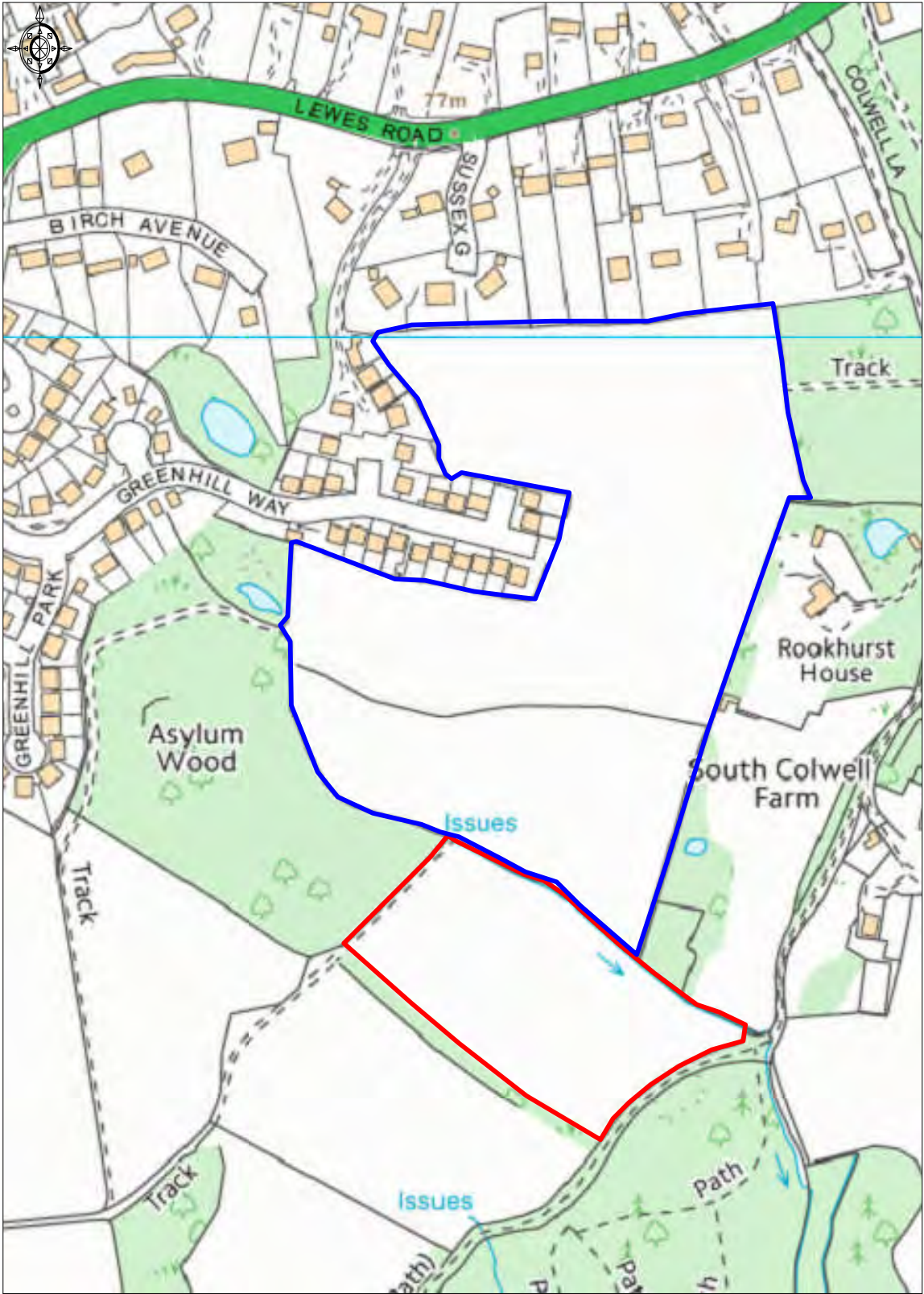
We trust the above comments are of assistance in preparing the required and necessary modifications to the Local Plan (alongside the submission version) and we await confirmation of receipt and registration of our representations in due course.

Yours faithfully,



Steven Brown BSc Hons DipTP MRTPI

Enc.



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Revision	Date	By	Description

Csa environmental planning e. ashwell@csaenvironmental.co.uk t. 01462 743647 f. 01462 743648	Dales Barns High Street, Ashwell, Hertfordshire, SG7 9NT
	Project Phase 3, Land at south of Greenhill Way, Haywards Heath
	Title Concept Masterplan
Client Taylor Wimpey UK Ltd	Scale 1:1000 @ A2 Date March 2015 Drawing Number CSa2635/100

Drawn RR	SelM
Checked RR	Revision -

Representation ID: REP/492/OMRepresentor Details:

Representor ID:	REP/492
Name:	
Organisation:	Taylor Wimpey UK Ltd
Consultation Body:	General
Stakeholder Type:	Planning Consultant

Agent Details:

Name:	Steven Brown
Organisation:	Woolf Bond Planning

Contact Details:

Email Address:	s.brown@woolfbond.co.uk
Address:	The Mitfords Basingstoke Road Three Mile Cross Berkshire RG7 1AT

Representation:

Policy/Section:	Housing Policy Context, Omission Site: Land south of Green Road, Wivelsfield Green
<i>Do you consider the document to be:</i>	
Legally Compliant:	Yes
Sound:	No Not Positively Prepared Not Justified Not Effective Not Consistent with national policy
Representation:	

(SEE PDF FOR FULL REPRESENTATION)	
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	Yes
Why do you feel it is necessary to participate at the Examination in Public?	



Woolf Bond Planning

Chartered Town Planning Consultants

Our Ref: SB/7779

Email: s.brown@woolfbond.co.uk

2nd November 2018

Planning Policy,
Lewes District Council,
Southover House,
Southover Road,
Lewes,
BN7 1AB

Dear Sirs

Lewes District Council – Local Plan Part 2: Site Allocations and Development Management Policies Pre Submission Consultation

Representations on Behalf of Taylor Wimpey UK Ltd.

INTRODUCTION

Background

We refer to the above consultation upon the Pre-submission version of the Local Plan Part 2 and write on behalf of our clients, Taylor Wimpey UK Ltd., concerning the omission of land to the south of Green Road, Wivelsfield Green as a housing allocation.

The Site is edged red on Plan WBP1 attached and represents a sustainable location in order to provide for a housing allocation in order to meet identified housing needs within walking distance from local services and facilities.

The allocation of the site for housing also provides the opportunity to work with the local community in order to provide additional community facilities including public open space provision. As such, we welcome the opportunity to work with both the District and Parish Councils in seeking to plan for an appropriately designed development.

Development Plan Context

The Local Plan Part 1 Inspector issued his initial conclusions regarding the Plan's soundness in February 2014. His conclusions advised that the District had passed the Duty to Cooperate and that full, objectively assessed housing needs (OAN) had been satisfactorily identified. However, the Inspector considered that there was a need for the District to carry out further work in attempting to meet as much of the defined OAN as possible. This is confirmed in the following two paragraphs taken from the Inspector's letter:

'However, despite the foregoing, I am not at all convinced that "no stone has been left unturned" by the Councils, in terms of seeking as many suitable and appropriate sites for new housing as possible that are realistically deliverable in sustainable locations across the plan area'.

...

'My preliminary conclusion is that the new housing provision in the plan has to go up to a minimum of 6,900 in total (from 5,790 as now), or at least 345 dwellings a year on average over the plan period'.

Spatial Context and Housing Targets

Lewes District is constrained as to further extensions to its principal settlements given the high proportion of the District that is covered by the South Downs National Park and two sites designated as Special Area of Conservation ("SAC"). Further the Ashdown Forest is also a designated SPA and is located within close proximity to the District's borders. In sequential terms, development on land located outside such designations should be brought forward first.

It should be noted that the housing requirements set out in Spatial Policy 2 of Local Plan Part 1 are clearly expressed as minimums and where appropriate growth should exceed this minimum figure. This is particularly the case given the requirement for additional sites to be released for development in order to meet the local housing need identified in accordance with the standard methodology (as set out in the NPPF) from May 2021 onwards (at which point the strategic housing requirements set out in the Local Plan Part 1 will be more than five years old).

Moreover, and as demonstrated in the Council's five year housing land supply position statement as at April 2018, the Council is unable to demonstrate a five year supply of deliverable housing land when assessed at the District level or in that part of the District excluding the national Park.

The Local Plan Part 2 lacks the necessary flexibility to ensure an adequate and responsive supply of deliverable housing land. This includes in relation to the over reliance on sites in a number of emerging Neighbourhood Plans; relating to 425 dwellings at Newhaven, 255 dwellings at Peacehaven & Telscombe and 185 dwellings at Seaford.

This further justifies the need for additional allocations, including possible reserve sites.

Our client's site offers one such location where this can be achieved in a sustainable manner.

For the above reasons we are of the strong view that the potential of the subject 20.6ha site should be identified in the Local Plan Part 2 as a housing allocation. The site is supported by a national housebuilder and could therefore be delivered soon after the adoption of Local Plan Part 2.

OMISSION SITE - LAND SOUTH OF GREEN ROAD, WIVELSFIELD GREEN

Site Characteristics

The two parcels of land comprise approximately 20.6ha, the eastern parcel measures approximately 8.7ha and the western parcel 11.9ha. The parcels can be seen on Plan WBP1.

As illustrated on the satellite image below, the site is contained from longer views into and from the village by existing landscaping, which can be enhanced as part of proposals to bring the site forward for development.

In terms of the local context, land to the north comprises existing residential development fronting Green Road. Wivelsfield Primary School is located to the east. To the west is residential development fronting Eastern Road. To the south lies dense woodland.

Local services and facilities are within walking distance from the site. The site is also served by existing bus routes (and stops) on Green Road.

Not only are the two parcels located within a sustainable location in terms of access to a range of services; the overall size of the site allows for a residential development together with extensive areas of public open space that would further benefit the local community.



Satellite Image of Site

The site represents a sustainable location for future growth to meet defined needs for housing development.

The site's main potential access could be from Green Road. This is supported by the SHELAA Site Assessment comments which state, for Site 28WV, "ESCC Highways state that visibility sightlines are considered achievable on Green Road..."

As to the merits of the site as a housing allocation, it was previously identified in an earlier version of the Council's SHELAA as being suitable, available and achievable for housing development. In addition, the site was also identified as a potential housing

allocation under Policy RE3 of the earlier (now superseded) 2003 Local Plan, with the supporting text suggesting that the site may be suitable for 190 dwellings. However, this development potential was never realised.

The most recent version of the SHELAA (Sept 2018) incorrectly asserts that the site is not available. On the contrary, the site is available for development and is being promoted as a sustainable option for growth by a national housing developer.

The SHELAA assessment states in relation to the site as follows:

“Greenfield site adjacent to the planning boundary. Unclear from most recent submitted information where and how the site is to be accessed. However, site fronts Green Road to the north for potential access. ESCC Highways state that visibility sightlines are considered achievable on Green Road and that site is well positioned in village to access services available within Wivelsfield Green. Other services are available within the nearest town, Burgess Hill, are accessible bus. No historic designation constraints. ESCC Archaeologist states that there is a medium potential for historic environment. ESCC Landscape Architect states that new development line should not exceed southern edge of the primary school to mitigate potential impacts on landscape. The LCS finds the area south of Green Road to be a preferred area for development at Wivelsfield Green in landscape terms with medium/high capacity provided no further south than southern boundary of primary school. Site is designated as a Local Green Space in the Wivelsfield neighbourhood Plan.”

Access to the site can be provided from Green Road, and as identified, the site has been identified in the Council's LCS as the preferred area for development at Wivelsfield Green in landscape terms.

Whilst the eastern segment of the site is designated as a green space in the Neighbourhood Plan, we welcome the opportunity to work with the Parish Council to realise part of the site for publicly accessible green space, along with some residential development.

Development of the site for housing could help deliver the aspiration for accessible local green space under Policy 7 of the Wivelsfield Neighbourhood Plan. The site could also help delivery of additional facilities to support the existing primary school.

By virtue of Haywards Heath's designation to the northwest as a 'Secondary Regional Centre', the site is well placed with regard to local employment opportunities. In addition, the Core Strategy (2016) designated Wivelsfield Green as a Service Village.

Service Villages are described as *“Villages that have a basic level of services and facilities, public transport provision (possibly not frequent) and limited employment opportunities. Residents can have some of their day to day needs met in such locations, although higher order settlements need to be accessed to enable this to be fully achieved.”* It follows that the site forms a sustainable location for residential development. The site is suitably located to key services and facilities and would provide a logical extension to Wivelsfield.

Proposed Change:

Land South of Green Road, Wivelsfield Green to be allocated for up to approximately 300 dwellings, together with the provision of public open space and potential community facilities and/or land to be provided to serve the existing primary school.

SUMMARY

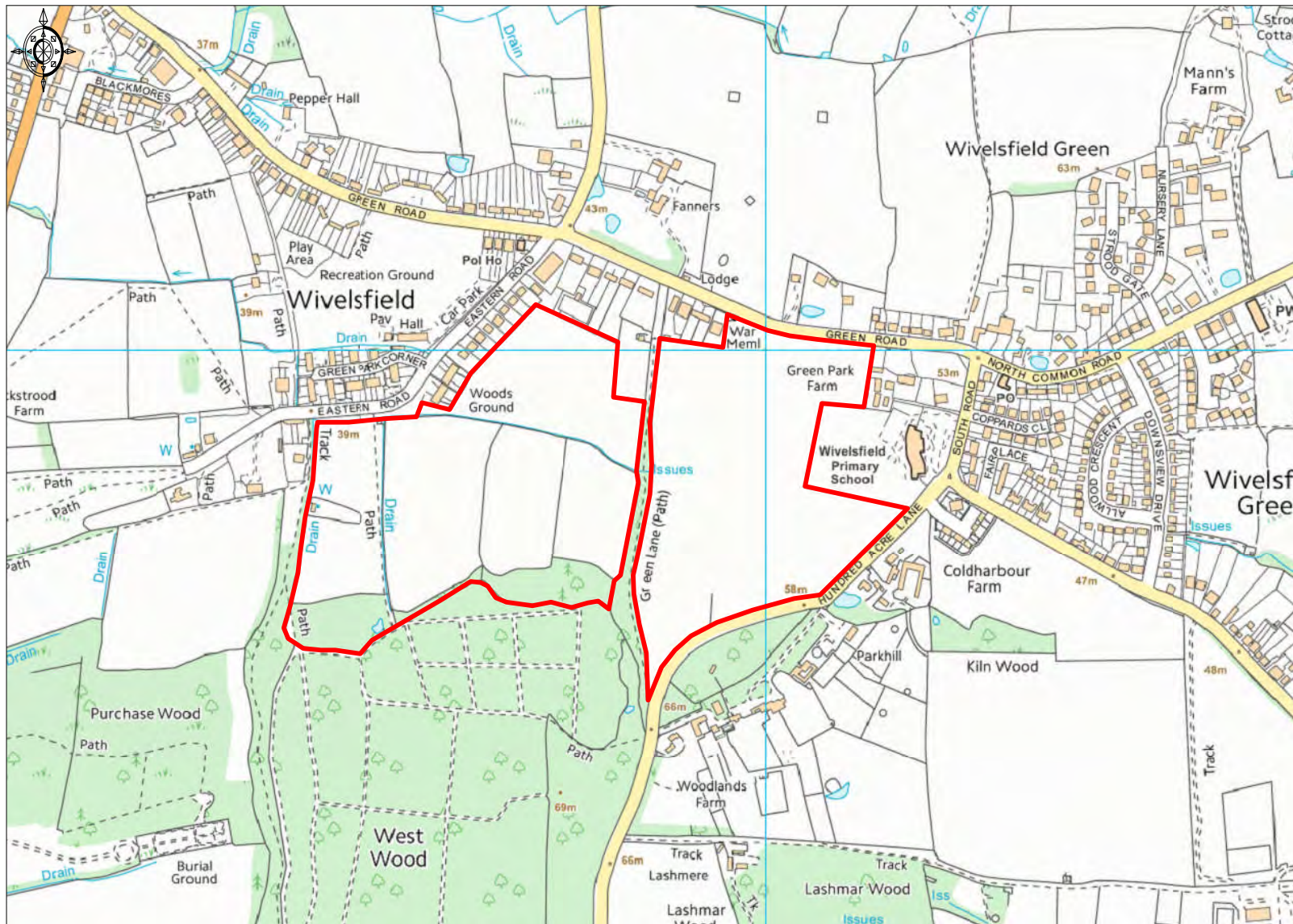
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Yours faithfully,



Steven Brown BSc Hons DipTP MRTPI

Enc.



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